



Quod

Planning Statement & Retail Impact Assessment

28 East Retail Park,
Newport

FEBRUARY 2025

Q50283

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Documents

- 1 Letter of Support from Poundland
- 2 Site Location Plan
- 3 Relevant Planning history
- 4 Retail Analysis

1 Introduction

- 1.1 This Planning Statement & Retail Impact Assessment ('PSRIA') has been prepared by Quod, on behalf of Newport Lux S.A.R.L ('the Applicant'), in support of a planning application to modify the existing goods restriction at Unit 6, 28 East Retail Park, Docks Way, Newport NP20 2NN ('the Application Site'). The application is being pursued to facilitate the reoccupation of Unit 6 (which is currently vacant) by the national retailer, Poundland.
- 1.2 The application is being pursued to maintain the long-term success of 28 East Retail Park as an important retail destination for Newport's residents and visitors that continues to complement the retail offer in the City Centre and neighbouring centres.
- 1.3 The Application Site comprises a well-established retail park (28 East Retail Park) accessed off Docks Way. Unit 6 has been vacant since Staples (the last occupier of the unit) suffered a high-profile failure nationally in 2019, falling into administration, resulting in a loss of jobs that have never been replaced within the unit.
- 1.4 The retail warehouse market has changed significantly in recent years. In addition to the many publicised administrations and CVAs, traditional out of town retailers are now reducing their store requirements.
- 1.5 Unit 6 is currently restricted in terms of the goods that can be sold, principally limited to bulky goods retailing. After continued extensive marketing, it remains that no interest has been expressed from retailers that could trade under the existing goods restriction, particularly given the already strong non-food retail warehouse offer in Newport and surrounding area. Consequently, there is a clear threat that existing floorspace will remain vacant, continuing to make no positive contribution to the local economy in challenging economic times when job creation and investment is critical.
- 1.6 Whilst there has been a decline in the non-food bulky goods sector in recent years, over the same period there has been an increase in activity within the discount sector, which includes an element of food and drink sales. Indeed, this application is being pursued to enable the national retailer, Poundland, to increase their representation in Newport and trade from the existing unit. Heads of Terms have been agreed.
- 1.7 Poundland is already represented in Newport, with an existing store at Newport Retail Park in the east of the City, together with the recently opened store within Friars Walk shopping centre in the City Centre. This follows Poundland's relocation from smaller premises within Kingsway shopping centre elsewhere in the City Centre. This substantial recent investment demonstrates the operator's commitment to Newport. The proposed new store at the Application Site will be in addition to Poundland's existing representation within Newport and will principally seek to serve residents in the west of the City. A letter of support from the Poundland is enclosed at **Document 1**.
- 1.8 In addition to improving choice to the benefit of shoppers in this part of Newport, the proposal will also positively contribute to the local area through the retention and creation of jobs and associated benefits, together with increased business rates to the benefit of Newport City

Council ('NCC'). The proposals will also secure the long-term occupancy of existing retail floorspace located in a prominent location that complements the existing offer within the City Centre and that which is available within nearby district and local centres.

1.9 The purpose of this Statement is to address relevant planning policies arising from the applications in the context of national guidance and the statutory development plan. As we will demonstrate, the proposals have significant merit and are consistent with national planning policy. The presumption in favour of sustainable should therefore apply and planning permission should be granted without delay.

1.10 Consistent with national policy, the proposals have been the subject of a pre-application submission to NCC. Further details of the pre-application are provided in this report. The scope of this Statement and wider supporting evidence has been agreed with Officers in advance, meaning the key issues have been identified and are accordingly addressed within the submission.

1.11 In terms of the structure of this report:

- **Section 2** sets out the factual background of the proposal, including the Application Site and surrounding area, the relevant planning history, and the pre-application discussions.
- **Section 3** outlines the proposed development and the proposed occupier.
- **Section 4** outlines the planning policy framework within which the proposals should be considered.
- **Section 5** deals with the relevant retail policy requirements.
- **Section 6** considers other relevant development management considerations.
- **Section 7** outlines the development benefits.
- **Section 8** provides a summary of the application and sets out the conclusions.

2 Factual Background

Site and Surrounding Area

- 2.1 28 East Retail Park is located approximately 2 kilometres to the southwest of Newport city centre and comprises 11no. retail units. This includes representation from B&M, The Range and The Food Warehouse. A freestanding drive thru (KFC) is also located at the entrance to the retail park. Access to the retail park is off Docks Way, which connects to the A48 to the southwest of the park. The retail park benefits from its own dedicated parking and appropriate servicing to the rear.
- 2.2 Unit 6 extends to 1,302 square metres and is currently vacant, having formerly been occupied by Staples.
- 2.3 The wider area comprises industrial, retail and residential development, including the Alexandra Docks to the southeast and the Maesgas Retail Park to the northeast. To the southwest, across the A48, is greenfield land.
- 2.4 A Site Location is provided at **Document 2**.

Relevant Planning History

- 2.5 There is extensive planning history associated with the retail park, with the key details of relevance to the current proposals outlined below.
- 2.6 The majority of 28 East Retail Park was granted planning permission in September 2001 (ref. 00/0760), which allowed for the construction of 6/7no. retail units. The consent specifically granted consent for the following:

“Development of 6/7 Retail Units and a Fast Food Outlet”

- 2.7 This permission was subject to 22no. conditions. Condition 7 restricted the retail good permitted to be sold as follows:

“The units identified as 02, 03, 04, 05 and 06/07, as shown on plan (20)200P, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987”

- 2.8 Planning permission was subsequently granted on the 14th August 2008 (ref. 08/0936) for the change of use of Unit 6 to enable Staples to trade from the existing floorspace. This consent was subject to 3no. conditions, including the following amended goods restriction (Condition 1):

“The unit known as Unit 6 and identified on the plans hereby approved, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fitting, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, office supplies, office equipment / technology, and ancillary uses (including a print shop, copy centre, service centre for office equipment, technology centre and limited customer refreshments, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987.”

- 2.9 It is this goods restriction that this application is seeking to amend. A similar Section 73 application for Unit 6 was submitted in July 2023 (ref. 23/0587). This application was withdrawn by the Applicant in October 2023 prior to determination. However, the matters raised by Officers in the consideration of this application have been assessed as part of this new application.
- 2.10 Elsewhere within the retail park, planning permission was granted in August 2018 (ref. 18/0422) to vary Condition 7 of planning permission 00/0760 to enable the sale of food and drink from Unit 2, together with up to 20% of the floorspace to be used for the sale of ancillary goods. The consent enabled The Food Warehouse (now trading) to occupy the unit.
- 2.11 Details of the above planning history is contained at **Document 3**.
- 2.12 In addition, there are two planning applications have been submitted seeking the amalgamation of Unit 3 and Unit 4 at 28 East Retail Park to allow their re-occupation by Aldi (refs. 24/0066 & 24/0067). These applications are pending determination.

3 Proposed Development

- 3.1 The application is modest in nature and simply seeks to amend the existing goods restriction to enable Poundland to trade from Unit 6. Accordingly, the following revised condition is proposed:

“The unit known as Unit 6 and identified on the plans hereby approved, shall only be used for the sale of toys, leisure products, home and garden goods, flowers, hardware, pet care products and pet foods, books, newspapers and magazines, stationary including greeting cards, confectionary, grocery, toiletries, clothing, accessories, alcoholic drinks for consumption off the premises, tobacco, save that any single product category shall not exceed 10% of the gross floor area with the exception of grocery and alcoholic drinks for consumption off the premises which shall not exceed 30% of the gross floor area and fashion, accessories and footwear, which shall not exceed 30% of the gross floor area, and items ancillary thereto and installation of a standalone ATM and / or National Lottery.”

- 3.2 This represents the extent of the proposals. Accordingly, the application proposals seek to introduce a modest widening of the existing goods restriction to include up to 30% (or 391 square metres) to be used for the sale and display of convenience goods.
- 3.3 No external changes are sought by this application.
- 3.4 As highlighted, the proposals are being pursued to enable Unit 6 to be occupied by Poundland – a leading national discount foodstore operator.

4 Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning application should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 In this instance the Development Plan comprises Future Wales: The National Plan 2040 (February 2021) and the Newport Local Development Plan 2011-2026 (January 2015).
- 4.3 Material considerations include Planning Policy Wales (Edition 12, February 2024), Technical Advice Note 4: retail and commercial development (TAN 4) (November 2016), and the Newport Retail Study Addendum 2023.

Development Plan

Future Wales: The National Plan 2040

- 4.4 Future Wales, which was adopted in February 2021, provides the national development framework for Wales and has development plan status.
- 4.5 **Policy 1** outlines that the Welsh Government supports sustainable growth in all parts of Wales, with Newport, along with Cardiff and the Valleys, identified as one of three National Growth Areas.
- 4.6 Retail and town centres matters are covered under Policy 6, which states that:

“Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.

A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.”

- 4.7 The supporting text to this Policy identifies that the future of town and city centres is moving away from their traditional roles and becoming more multi-functional places.
- 4.8 It is also significant to note that the supporting text confirms that this Policy *“relates to new developments and does not apply to extensions to existing facilities”*. (our emphasis). This specific matter was recognised by Officers in the determination of the withdrawn application for Unit 6 at 28 East Retail Park (ref. 23/0587).

Newport Local Development Plan

- 4.9 28 East Retail Park is not allocated for any specific use on the Proposals Map that accompanies the Local Development Plan.
- 4.10 **Policy SP1** ('Sustainability') favours proposals that make a positive contribution to sustainable development.

4.11 Policy SP19 ('Assessment of Retail Need') outlines that development that retail and associated uses will be subject to an assessment of need if not within a defined centre, and application of the sequential test if not within the City Centre.

4.12 The Policy goes on to state that development will be located according to the following hierarchy of retail centres:

1. Newport City Centre
2. District Centres (as referenced under Policy R6)
3. Local Centres
4. Out of Centre Retail Sites

4.13 The supporting text to this Policy (para. 2.83) states that:

"Development should be of a scale appropriate to the retail centre within which they are located, and should contribute to or sustain the vitality and attractiveness of that retail centre within the hierarchy. Smaller scale retail, leisure and other uses such as brand offices and cafes may be more appropriately located in District or Local Centres."

4.14 Policy R11 ('Development of Existing Out-of-Centre Retail Sites') notes that outside the City Centre and district centre, proposals for redevelopment of and extension to out-of-centre retail outlets involving increases in floorspace to previous consents and / or changes to the range of goods sold will only be permitted provided that:

"i) Need is identified;

ii) The proposed development would not, either in its own right, or cumulatively with other out of centre developments and outstanding planning permissions, have an adverse effect on defined retail centres as a consequence of the type or range of goods sold;

iii) The sequential test can be satisfied having regard to the availability, suitability and viability of city centre district centre sites, or edge-of-centre sites which could accommodate the proposed retail uses;

iv) The proposal would not increase the land area of the site;

v) The surrounding highway and transportation network has capacity to serve the development, and that accessing and servicing arrangements can be accommodated in a satisfactory manner;

vi) The proposal is fully accessible on foot, by bicycle and by public transport."

4.15 The supporting text to this Policy (para. 8.33) states that:

"The desire on the part of retailers to improve the appearance and functioning of their premises is recognised, but care is required to ensure that there are not increases in floorspace for

comparison goods, including convenience stores, that could adversely affect the City Centre or other defined retail centres.”

- 4.16 **Policy T4** (‘Parking’) states that development will be expected to provide appropriate levels of parking.

Material Considerations

Planning Policy Wales (Edition 12, February 2024)

- 4.17 Planning Policy Wales (‘PPW’) is the Welsh Government’s policy document that sets out the framework for sustainable land use. The document supports all strategies published by the Assembly and is supplemented by various Technical Advice Notes (TANs).
- 4.18 Chapter 4 deals with retail and commercial development and identifies (para. 4.3.14) that when determining planning applications for retail development, planning authorities should first consider where there is a need for additional retail provision.
- 4.19 Paragraph 4.3.15 outlines that:
- “Need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace, particularly as a basis for development plan allocations.”*
- 4.20 In terms of planning applications for retail development, PPW (para. 4.3.25) states that:
- “Retail developments outside designated retail and commercial centres, and which are not located on an allocated site, can impact on the viability and vibrancy of a centre. Impacts resulting from such development, whether individual or cumulative, may include changes in turnover and trading ability, consumer choice, traffic and travel patterns, footfall, as well as affect centre regeneration strategies and existing or proposed retail sites allocated in the development plan. The purpose of the retail impact assessment is to consider these issues and determine if these developments are likely to have detrimental consequences.*
- 4.21 Paragraph 4.3.26 requires all retail planning applications of 2,500 square metres or more of gross floorspace at the edge of or outside a designated retail and commercial centre to be supported by a retail impact assessment, where a need has been established.
- 4.22 Paragraph 4.3.27 goes on to state that for smaller retail planning applications requests for retail impact assessments may be necessary. However, where such a request is necessary, such an assessment should be proportionate to the scale of development proposed.
- 4.23 In terms of the sequential approach, PPW promotes the town centre first approach by requiring retail proposals to satisfy the requirements of the sequential test, which seeks to focus development within existing centres in the first instance. However, paragraph 4.3.19 does state that:

“If a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are available, only then should out-of-centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered.”

4.24 PPW goes on to note (para. 4.3.20) that:

“edge-of-centre or out-of-centre sites should be accessible by a choice of public and private modes of travel.”

4.25 Paragraph 4.3.23 also recognises that there are certain types of retailers that may not be able to find suitable sites or buildings within existing retail and commercial centres. Where this is the case, such stores should in the first instance be located on sites identified for such purpose, followed by edge-of-centre sites, and then out-of-centre sites.

4.26 PPW recognises retail as economic development, and that the planning system should support economic development.

Technical Advice Note 4: Retail and Commercial Development (November 2016)

4.27 Technical Advice Notes (TANs) are material to decisions on individual planning applications and should be read alongside PPW. Local planning authorities should take TANs into account when they are preparing development plans and determining planning applications. Relevant to the proposals is TAN 4, which identifies the three retail tests: retail need; the sequential test; and retail impact.

4.28 Paragraph 6.1 of TAN 5 requires proposals for new retail development outside of defined centres to demonstrate quantitative need, based on the forecasting of expenditure of comparison or convenience goods over a period of time. This is then assessed against the current level of provision.

4.29 Qualitative need is considered at Paragraph 6.6, and the overall objective of this approach is to identify appropriate sites to meet the needs of all communities. Paragraph 6.7 provides examples of qualitative need, including:

- Supporting the retail strategy of an adopted development plan;
- Are highly accessible and would result in a reduction in traffic congestion; and
- Address locally defined deficiencies and alleviates a lack of convenience provision in a disadvantaged area.

4.30 TAN 4 expands on the requirements of the sequential test and provides the criteria that makes a site ‘suitable’. In terms of suitability, paragraph 7.2 states:

“Suitability refers to a site or building’s attributes and whether these are sufficient to meet the development. This exercise should not necessarily be confined to an individual centre and developers should consult with the local planning authority to ascertain the extent of any search for other potentially suitable sites or buildings within the wider catchment area.”

4.31 TAN 4 (para. 8.2) identifies when a retail impact assessment would be required and states:

“Retail applications of 2,500 square metres or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment provided by the developer...Smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre. Requests for retail impact assessments by local planning authorities on smaller developments should be proportionate to potential impacts.”

4.32 Paragraph 8.3 provides a range of criteria, in addition to the three retail tests, that planning applications for retail developments on the edge of or outside of a centre should be assessed against:

“Impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area.

Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.

Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.

The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.

Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.

Assessment of the proportion of customers using the development travelling by different modes of transport.

Impact on travel patterns over the catchment area.

Any significant environmental impacts.”

Newport Retail and Leisure Study Addendum (July 2023)

4.33 Nexus Planning was commissioned by NCC to produce a Retail and Leisure Study for Newport and its surrounding area to inform planning decisions relating to future retail provision over the plan period. This was completed in November 2019. Nexus completed an update to this evidence (the Newport Retail and Leisure Study Addendum (NRLSA) in 2023).

4.34 In terms of convenience retailing, the NRLSA identifies no capacity for additional floorspace at current market share. However, the Study identifies (para. 4.10) that there may be evidential reasons to grab new permission on a case-by-case basis.

4.35 For comparison retailing, the NRLSA identifies surplus capacity of £10.4 million by 2031 (over and above retail commitments at the time) just to maintain current market share. This is

4.36 identified to identified to increase to £65.9 million by 20246. These levels of capacity equate to a minimum requirement of at least 1,600 square metres (net) in 2031, rising to at least 8,700 square metres by 2036.

Summary

4.37 The starting point for determining proposals is the adopted Development Plan, which in this instance is the Newport Local Development Plan and Future Wales: The National Plan.

4.38 The Application Site is not allocated for any specific use, although comprises an out-of-centre location in retail planning policy terms being located more than 300 metres from the nearest defined centre (Cardiff Road local centre). In such locations, retail proposals need to consider the relevant retail 'tests' – namely retail need, the sequential approach to site selection, and dependent on scale, retail impact.

5 Principle of Development

- 5.1 Although the Application Site comprises an out-of-centre location in retail policy terms, it forms part of a well-established retail destination (28 East Retail Park). This includes planning permission recently being permitted to enable The Food Warehouse to trade from existing floorspace. The principle of retail development in this location (including convenience retailing) has therefore been accepted.
- 5.2 However, the advice contained within the Local Plan, and national policy, requires the relevant retail 'tests' to be addressed. We deal with each matter in turn below.

Retail Need – Quantitative

Context

- 5.3 PPW (para. 4.3.13) states that:

"It is important that communities have access to adequate levels of retail provision. Evidence should demonstrate whether retail provision is adequate or not, by assessing if there is further expenditure capacity in a catchment area (quantitative need) or if there is a lack of retail quality, range of goods or accessibility (qualitative need)."

- 5.4 When considering retail need, it is important to note that the proposal seeks to utilise existing retail floorspace that can already be occupied by a range of retailers. No increase in retail floorspace is proposed. When assessing retail 'need' the turnover of the existing floorspace is a valid consideration when identifying a need for the application proposals. Such an approach is entirely consistent with that deemed acceptable by NCC in granting consent to enable The Food Warehouse to trade from the Retail Park (ref. 18/0422). Indeed, when considering retail need, the Officer's Report for this application states (para. 5.7.1) that:

"As the unit has an extant retail planning permission, albeit on a restricted basis, the turnover of the unit functioning as a bulky goods store is also a valid consideration...[and] The proposed uplift in retail turnover from the variation of goods represents 1% of the growth in retail expenditure up to 2023 and indicates that there is sufficient retail capacity to satisfy the policy requirements with regards quantitative need."

- 5.5 NCC's approach to considering quantitative need in allowing The Food Warehouse to trade from existing retail floorspace at the Retail Park based on uplift in turnover provides important context when assessing quantitative need. As illustrated at Table 5.1, the potential turnover of the existing floorspace based on a range of retailers that could lawfully trade from the existing floorspace could be greater than of the proposed occupier (Poundland).

Table 5.1: Potential Turnover of Existing Floorspace

Retailer	Sales Density (£ per sq m)	Turnover (£m)
Currys	4,586	5.97
DFS	3,445	4.49
Poundland	3,226	4.20

Notes: Sales densities derived from GlobalData (2024), and turnover based on applying the sales density to the existing floorspace At 2021 prices

- 5.6 A need is also demonstrated by the fact that an end occupier has been identified for Unit 6 (Poundland), who is looking to strengthen their existing offer in Newport.
- 5.7 When considering need, NCC's latest retail evidence (the NRLSA) identifies capacity for £10.4 million by 2031, equating to a need for at least 1,600 square metres (net) of additional comparison goods floorspace (over and above outstanding commitments at the time).
- 5.8 This level of 'capacity' is more than sufficient to support the modest widening of the existing goods restriction of Unit 6, which extends to 1,302 square metres in total, and the proposed widening in comparison goods relates to just 30% (or 391 square metres) of the existing floorspace, which can already be used for comparison retail sales.
- 5.9 With regard to convenience goods, it is acknowledged that the NRLSA did not identify a quantitative need for additional convenience retail floorspace in Newport. However, in reviewing the NRLSA, this assessment was underpinned by a household survey undertaken in 2018. In reviewing this household survey, it is important to highlight the following:
- The household survey was conducted between the 12th and 19th December. Because of the timing of the survey, the results are likely to have been skewed by the impact of Christmas shopping. Indeed, unlike comparison shopping, the household survey did not ask respondents where they typically shopped for convenience goods (excluding Christmas shopping). Instead, the household survey simply asked respondents where they 'last' went to undertake their main food or top-up food shop. No recognition was given to the potential influence of Christmas shopping for convenience shopping. Such an approach may be a factor in the retail evidence identifying that the convenience goods market share of facilities in Newport had significantly fallen since 2010 – from 70% to 50% in 2018.
 - The household survey was undertaken in 2018, more than 6 years ago. It does not provide an up-to-date assessment of current shopping patterns. Indeed, since the completion of the household survey there has been the Covid-19 pandemic and the cost-of-living crises, both of which have had an impact on shopping patterns for a variety of reasons.
 - There has also been a change in the retail offer in the Newport area since the completion of the household survey. This has included the opening of new stores (such as The Food Warehouse at 28 East Retail Park and new Lidl at the South Wales Argus site replacing their store at West Retail Park, which has subsequently closed). This improvement in the retail offer will have had an impact on shopping patterns in the local area.

- 5.10 Given this, we have significant concerns regarding the robustness of the findings of the household survey that underpins the NRLSA, particularly as a basis to understand current convenience quantitative need.
- 5.11 Furthermore, in reviewing the approach of the NRLSA, the suggested lack of quantitative need for additional convenience goods floorspace is due to the RLSA suggesting that existing facilities within Newport are trading substantially below expected levels. Whilst household surveys are useful in understanding broad shopping patterns, they should be treated with caution in identifying actual turnovers of individual stores. Nevertheless, and notwithstanding our concerns in continuing to rely on the 2018 household survey, in reviewing the approach undertaken in the RLSA¹, we also question a number of the floorspace assumptions applied in estimating the expected turnover of existing stores. These concerns lead to the level of undertrading (and subsequent lack of capacity) being incorrectly overstated by the NRSLA.
- 5.12 Finally, the capacity assessment undertaken by the NRLSA focused on the administrative area as a whole. It did not consider 'need' in specific parts of the City. Accordingly, the assessment fails to identify whether there are needs in certain parts of the City. Such an approach is at odds with the advice contained within PPW. Paragraph 4.3.13 of PPW (as outlined above) is clear in stating that quantitative need should consider whether there is expenditure capacity in a catchment area. Such an assessment has not been undertaken as part of the NRLSA.
- 5.13 For all these reasons, we question the robustness of the NRLSA in identifying whether there is a quantitative need for additional convenience retailing at 28 East Retail Park – as currently proposed.

Updated Needs Assessment

Convenience Goods

- 5.14 It is established that there is a need for the modest widening of the comparison goods proposed – as supported by the findings of the NRLSA. Furthermore, within the immediate local area (i.e. Zone 5 of the wider Study Area identified by the NRLSA), comparison retail expenditure is identified to increase by £4.85 million between 2025 and 2028. This compares to the widening of the goods restriction achieving a convenience retail turnover of approximately £1.26 million¹. Even if it is assumed that 100% of the proposal's comparison retail turnover is derived from Zone 5, there is more than sufficient growth to support the proposals.
- 5.15 Therefore, quantitative need is focused on the convenience goods element proposed (i.e. up to 391 square metres of the existing floorspace).
- 5.16 Given the above concerns, in assessing a quantitative need for additional convenience goods, we have undertaken an update of the NRLSA. This update has been informed by a more recent household survey that was completed in November 2022. This provides a more up-to-date basis to understand existing shopping patterns.
- 5.17 The survey area for this household survey has been based on zones 1 to 7 (inclusive) of the area identified for the NRSLA, and previous retail evidence undertaken on behalf of NCC.

¹ 391 square metres x £3,226 per square metre

5.18 The updated assessment also applies the following approach:

- Utilises the latest population and retail data now available (from Experian);
- Applies revised floorspace figures for existing stores based on site visits and drawing upon available information (including relevant planning applications and Valuation Office Agency data); and
- Applies the latest ales densities for national retailers derived from GlobalData (2024), which was published after the completion of the NRLSA.

5.19 This updated assessment is contained at **Document 4**.

5.20 In addition, rather than assessing retail ‘need’ in Newport as a whole, given the nature of the proposal it is reasonable and appropriate to assess the retail capacity in a more localised area (i.e. the area where the proposal is identified to derive the bulk of its trade). Such an approach is consistent with that deemed acceptable by NCC in determining retail proposals elsewhere in the City.

5.21 Given the nature of retailing proposed, and the strength and proximity of competing provision (including representation from comparable retailers, including Poundland), the updated assessment has focused on capacity within Zones 1 and 5 only.

5.22 Within this area, our updated assessment identifies that a quantitative need for additional convenience goods floorspace can be demonstrated – as set out at Table 5.1.

Table 5.1: Summary of Available Capacity (Zones 1, 3, 5 & 6 only) – existing market share

	2025	2028	2031
Available Convenience Retail Expenditure (£m)	216.91	219.22	222.15
Expenditure Retained in Zones 1, 3, 5 & 6 (£m)	154.19	155.83	157.91
Current Market Share	71.1%	71.1%	71.1%
Benchmark Turnover of Existing Stores (£m)	142.48	143.33	144.05
Residual Capacity (£m)	11.71	12.50	13.86

Source: Table 4 at Document 4

5.23 Based on maintaining existing market shares, there is identified to be existing capacity of £12.50 million in 2028, rising to £13.86 million by 2031. This level of capacity compares to the convenience goods turnover of the proposed development of £1.27 million by 2028². Indeed, the convenience retail turnover of proposal represents approximately 11% of the identified capacity.

5.24 Furthermore, this does not represent the maximum ‘retail capacity’ within the local area. Our assessment identifies that more than £62 million of convenience retail expenditure generated in the local area in 2025 is directed to facilities elsewhere. There is therefore substantial scope to reduce this ‘leakage’ of locally generated expenditure through improving the retail offer

² Table 6a at Document 4

locally – as proposed. Even if just 10% of this leakage is retained locally, the level of ‘capacity’ increases to more than £18 million by 2028.

5.25 In addition, planning permission has recently been granted for the demolition of Newport West Retail Park, and the erection of a single retail unit to be occupied by Home Bargains (ref. 23/0091). This development, which is in the progress of coming forward, results in an overall reduction in convenience retail floorspace in this location of 404 square metres. Based on applying a cautious average convenience sales density of £7,500 per square metre, this equates to approximately £3 million of additional convenience retail capacity being made available in the local area.

5.26 Against this background, it can be demonstrated that there is more than sufficient quantitative convenience need to support the application proposals.

Comparison Goods

5.27 As previously highlighted, in terms of quantitative need for additional comparison goods floorspace, the NRLSA identified retail capacity of £10.4 million³.

5.28 Furthermore, the proposal seeks to utilise existing retail floorspace that can already be occupied by a range of comparison retailers. Based on typical retailers that could trade from this floorspace, the proposals have the potential to result in an overall reduction in comparison retail turnover at the Retail Park.

5.29 Within this context it can also be demonstrated that a quantitative need exists for the modest widening of the existing goods restriction.

Retail Need - Qualitative

5.30 In terms of qualitative need, TAN 4 (para. 6.6) outlines that the overall objective of applying the quantitative need approach is to:

“...achieve an appropriate distribution and range of sites for retail stores which meets the needs of all communities

5.31 TAN 4 (para. 6.7) goes to identify a number of aspects that could demonstrate a qualitative need for new retail development. These include addressing local deficiencies and alleviate a local of convenience provision and contribute to reducing car journeys, traffic congestion or overtrading.

5.32 Similar aspects are also identified within PPW (para. 4.3.16), which identifies that a qualitative assessment should cover both positive and negative aspects against each consideration.

5.33 Table 5.2 provides a summary of the proposed development against the qualitative considerations outlined by PPW.

³ Table 26d of Appendix A to the NRLSA

Table 5.2: PPW – Qualitative Need Considerations

Criterion	Comment
1. Supports the objectives of the retail strategy or an adopted development plan	Although the Application Site comprises an out-of-centre location in retail planning policy terms, it comprises a well-established retail destination. Local planning policy allows for retail proposals in this location subject to addressing the relevant retail 'tests'. Policy SP18 of the Local Plan also supports the re-use of vacant and underutilised land, which the proposals will achieve. Likewise, the proposals will accord with a number of the corporate objectives outlined within the Local Plan. This includes Objective 1, which seeks to locate development in the most sustainable locations and make a positive contribution to local communities, and Objective 3 through the provision of new employment.
2. Is highly accessible by walking, cycling or public transport	The Application Site already comprises a well-established retail destination that is accessible by a range of modes of transport, including, bus, walking, cycle and car.
3. Contributes to sustainable reduction in car journeys	By improving the convenience retail offer locally, this will reduce the need for local residents to travel elsewhere, resulting in an overall reduction in car journeys and car journey lengths. Paragraph 6.6 of TAN 4 confirms that <i>"The overall objective of applying the qualitative need approach would be to achieve an appropriate distribution and range of sites for retail stores which meet the needs of all communities..."</i> The application proposals will address this. By improving the distribution of retail facilities, including a retailer not currently represented in this part of Newport, will reduce the overall distance travelled by local residents and encourage more sustainable shopping patterns.
4. Contributes to the co-location of facilities in existing retail and commercial centres.	It is acknowledged that the Application Site is not located within an existing centre and therefore will not contribute to the co-location of facilities within defined centres. However, the proposed development seeks to utilise existing retail floorspace in an established retail park that already contains a range of retailers selling both food and non-food goods. Given this, there will be the opportunity for linked trips to take place between these facilities, further reducing the need to travel elsewhere and encourage sustainable shopping patterns.
5. Significant contributes to the vibrancy, attractiveness and viability of a centre	It is acknowledged that the Application Site is not located within a defined centre. However, it is an existing retail location and no overall increase in retail floorspace is proposed. Further, the existing floorspace can already be located by a range of non-food retailers (as reflected by the Application Site's history). As such, the retail impact of the proposals, which seeks to introduce a modest

Criterion	Comment
	range of additional retail goods at the Retail Park, will not be significant adverse and needs to be considered in the context that the existing floorspace already has / can have some impact on neighbouring centres.
6. Assists in the alleviation of overtrading of, or traffic congestion surrounding existing local comparable stores	Our updated assessment identifies that existing convenience retail facilities in the local area are overtrading. Within this context the proposed development will help to alleviate this overtrading and traffic congestion around existing stores.
7. Address locally defined deficiencies in provision in terms of quality and quantity	The proposed development will bring back into active use existing vacant floorspace, improving the quality and quantity of the retail offer within this part of the City.
8. Alleviates a lack of convenience goods provision in a disadvantaged area	As previously highlighted the proposal will introduce a national retailer selling an element of convenience goods. This will improve the offer locally. Furthermore, the Application Site is also located in one of the top 20% most deprived areas of Newport, with the percentage of Super Output Areas in Newport being in the most deprived 20% being well above the national average ⁴ .

5.34 PPW (para. 4.3.15) is clear in identifying that precedence should be given to establishing quantitative need before qualitative need is considered. In this respect, it has been demonstrated that there is a quantitative need for the proposal.

5.35 Nevertheless, taking all the qualitative factors in the round, a need (both quantitative and qualitative) can be demonstrated for utilising existing retail floorspace by a mixed discount retail operator (as proposed).

5.36 However, even if a need is not demonstrated, this does not automatically mean that an application should be refused. This was re-confirmed by the recent Waterstone Estates judgment⁵ (para. 70), which concluded that:

*“What is not true to say that if an application for planning permission for new detail development cannot establish need then **that is fatal to the application**. National planning policy is of course a material consideration; but a policy is only a policy. If a particular policy requirement is not met, **it must be open to the decision maker to grant planning permission if other material considerations outweigh identified planning harm including harm that results from a failure to comply with that requirement**. Even proposed development that is contrary to the local development plan, which has the entrenched importance given to it by Section 38(6), **may be granted planning permission if other material considerations outweigh that inconsistency**.” (our emphasis)*

5.37 Likewise, in granting consent for a new Aldi at Albany Street⁶, the Planning Committee acknowledged that wider benefits could outweigh policy conflict, which in that case related to

⁴ As identified by Welsh Index of Multiple Deprivation

⁵ Waterstone Estates Ltd v Welsh Ministers [2018] EWCA Civ 1571

⁶ ref. 22/0438

a number of issues, including flood risk, loss of employment and archaeology, in granting consent in 2023.

- 5.38 In light of the above, whilst we believe that a need for the proposed development can be demonstrated, there are significant material considerations that weigh in favour of the proposed development. These include bring back in active use vacant and underutilised retail floorspace, deliver investment and create substantial employment.

Sequential Approach to Site Selection

Context

- 5.39 It is acknowledged that the Application Site comprises an out-of-centre destination in retail planning policy terms. However, it does comprise a well-established retail destination that has previously been deemed appropriate for retail development.
- 5.40 Nevertheless, for the proposals to be deemed acceptable in this location the proposal will need to satisfy the sequential approach to site selection.

Methodology and Approach

- 5.41 Whilst the sequential approach seeks to focus retail development within defined centres, it does not preclude sites coming forward elsewhere if no available, suitable or viable sequentially preferable opportunity exists. This is reflected by previous decisions in the local area, including at 28 East Retail Park, with planning permission being granted to enable The Food Warehouse to trade from the Retail Park.
- 5.42 Furthermore, in understanding how the sequential approach should be applied, PPW (para. 4.3.23) recognises that:
- “Some types of retail store, such as those selling bulky goods and requiring large showrooms, may not be able to find suitable sites or buildings within existing retail and commercial centres.”*
- 5.43 The application is being pursued due to demand from a specific type of retailer that is seeking further representation in the local area to complement their existing offer within the City Centre and at Newport Retail Park. The nature of the retailer also has particular operator requirements, which are of significance in applying the sequential approach.
- 5.44 These requirements include minimum unit size (including appropriate floorplates allowing extensive display area) and adequate servicing arrangements. The location also needs to be accessible and benefit from prominent commercial frontage / be in an appropriate location to be viable for the intended occupier and other similar retailers.
- 5.45 The fundamental operational requirements of the intended occupier include the following:
- A unit measuring at least 929 square metres of floorspace at ground floor. This demonstrates flexibility, representing an approximate reduction of 30% when compared to the proposal and represents the minimum floorspace requirement of Poundland⁷.

⁷ As confirmed by commercial agents represents Poundland (<https://www.morganwilliams.co.uk/agency>)

- The ability to sell the full range of goods.
- The ability to provide a large floorplate at ground floor, which will enable the use of trolleys and provide large display areas.
- A commercially viable location.
- Simple, safe and efficient at grade servicing arrangements allowing HGVs to arrive, unload and leave the site without any disruption, conflict with the wider highway network or any negative impact on residential amenity.

5.46 These parameters are all essential in applying the sequential approach. Indeed, when considering ‘suitability’ TAN 4⁸ states that:

“Suitability refers to a site or building’s attributes and whether these are sufficient to meet the development.”

5.47 It is also important to reiterate that the proposals seek to reoccupy an existing retail unit that is accessible by a variety of modes of transport. Consequently, development opportunities do not represent a proportionate and appropriate approach in applying the sequential approach. The re-use of existing retail floorspace can be delivered quickly, and it would be unreasonable to wait a substantial time for the delivery of comprehensive redevelopment opportunities. The sequential assessment has focused on units that are available within a reasonable period (i.e. other vacant units).

5.48 Reflecting this, the area of search in applying the sequential approach has focused on Zones 1 and 5 of the wider Study Area identified for the NRLSA. This is a reasonable assessment of the core catchment of the proposal given the proximity and strength of existing competing retail provision. It is anticipated that the bulk (c. 70%) of the proposal’s turnover will be derived. Alternative sites located beyond this area would serve a different core catchment to that intended to be met by the proposed development.

5.49 In this respect, the sequential assessment has focused on the following areas:

- Newport city centre (Zone 5 of the Study Area);
- Handpost district centre (Zone 1);
- Malpas Road district centre (Zone 5); and
- Commercial Road district centre (Zone 5).

5.50 In terms of opportunities within the City Centre, which is located at the periphery of the Zone 1, it is important to reiterate that the proposals are being pursued to increase the discount variety offer of a specific retailer (Poundland) to serve recipients in the west of the City. Given this, locating the proposals within the City Centre, where there is an existing strong comparable offer. In this respect, it is reasonable to not consider opportunities within the City Centre in

⁸ Paragraph 7.2

applying the sequential approach. Such an approach is entirely consistent with that reached by NCC when determining the previous withdrawn application (ref. 23/0587).

5.51 In addition, whilst this area includes a number of local centres, these comprise small format centres and are not deemed appropriate for the scale of retail development proposed. Policy R8 of the Local Development Plan states that retail proposals outside the City and district centres will only be permitted where the proposal is of a scale appropriate to the locality. In this respect, the proposal is inappropriate in scale for local centres. Likewise, the limited role and function of local centres does not provide a long-term viable location for the proposed development – a large format discount store.

5.52 It is against this background that the sequential approach to site selection has been based.

Sites Considered

5.53 The following sites have been identified and assessed as part of our sequential assessment:

- 170-172 Commercial Road; and
- Other vacant units within and at the edge-of existing centres.

5.54 Further consideration of the above sites is provided below.

170-172 Commercial Road

5.55 This Site comprises the former Kwik Save located within Commercial Road district centre and is understood to be currently vacant.

5.56 Planning permission was granted in April 2017 for the installation of a new shop front, conversion of first floor offices and roof space to create 8no. residential flats, renovation of existing car park, external shop loading area and security boundary fencing and walls (ref. 17/0050). An application to extend the time expiry date of this permission by a further five years (ref. 22/0245) was subsequently submitted but this was refused in March 2023. Consequently, this permission has now lapsed.

5.57 However, a new planning application was submitted in October 2024 (ref. 24/0862) for a similar application to convert first floor offices to create 5no. residential units, the part change of use of the ground floor to create a café (57 square metres) and car park alterations. The Planning Statement submitted in support of the planning application states that the ground floor will largely remain in retail use and is intended to be occupied by Eurofoods, trading as a Masala Bazaar⁹. This retail unit is identified to extend to 830 square metres.

5.58 Whilst this application is pending determination, it is evident that the Applicant, who is also the freeholder, remains committed to delivering mixed-use development for this site. Furthermore, Eurofoods, who are identified as the occupier of the retail unit were also identified as the end-occupier for the April 2017 permission. Given this continued commitment, this site is not available for the proposed development.

⁹ Paragraph 3.12 of the supporting Planning Statement (dated October 2024)

5.59 Furthermore, the proposed retail unit extends to just 830 square metres. This is below the minimum floorspace requirement identified and comprises just 64% of the floorspace intended to be occupied by the prospective occupier at the Application Site (1,302 square metres).

5.60 Against this background, this site does not provide an available, suitable and viable sequential alternative to the Application Site.

Other Vacant Units within and at the edge-of Existing Centres

5.61 As with any existing 'town centre', there are vacant units and / or units being marketed within defined centres within the area of search of the application proposals. These all comprise small format units – as summarised at Table 5.3.

Table 5.3: Existing Vacancies / Units being Marketed within and at the edge-of Defined Centres in the Area of Search

Address	Floorspace (square metres)
Unit 2, Canal Terrace	104
136 Commercial Road	153
151 Commercial Road	36
34 Cardiff Road	64

Source: Commercial Agents

5.62 Overall, there is no unit within the area of search being marketed as available, which is suitable and viable for the proposed development. In the absence of any alternative opportunity to meet the specific need identified, 28 East Retail Park has been identified as a suitable location to meet the residents in the west of the City.

5.63 Against this background, the proposed development satisfies the sequential approach as set out in PPW, TAN 4 and the local development plan.

Trading Effects of the Proposed Development

5.64 PPW (para. 4.3.26) and TAN 4 (para. 8.2) identifies that impact assessments are required for proposals providing 2,500 square metres (gross) or more of floorspace. The Local Development Plan does not set a local threshold. Therefore, the national threshold applies when considering the application proposal. At 1,302 square metres, the application proposals being advanced fall below this default threshold. Furthermore, the proposed widening of retail goods relates to only up to a maximum of 781 square metres.

5.65 Whilst it is acknowledged that national policy identifies that requests for retail impact assessments may be necessary for small applications, it is important to reiterate that the Application Site comprises existing retail floorspace that can already be occupied by a range of retailers that itself will have an impact on neighbouring centres. The impact is not deemed a policy requirement in the consideration of the application proposals.

5.66 When considering the previous withdrawn application for Poundland, Officers at NNC highlighted that due to there being very limited capacity for new convenience and comparison

floorspace – as identified by the NRLSA – an impact assessment was deemed necessary. As outlined above, the level of retail capacity in the local area is substantially greater than that identified by the NRLSA and a clear need for the proposal can be demonstrated.

- 5.67 Notwithstanding this, for completeness and on a without prejudice basis, an assessment of the likely trading effects of the proposal has been undertaken. As recognised by national planning policy, this assessment is proportionate to the scale of development proposed.

Proposed Turnover

- 5.68 To quantify the potential effects of the proposal, it is necessary to estimate the likely turnover of the floorspace should it be occupied by Poundland.
- 5.69 To this end, best practice advocates that this should be based on the operator's 'benchmark' (or expected) turnover. The typical sales density for Poundland¹⁰ is identified to be £3,226 per square metre (at 2021 prices, to be consistent with the price base of the NRLSA, inclusive of VAT).
- 5.70 By applying this typical sales density, the proposed reoccupation of the floorspace by Poundland is identified to be £4.20 million. This includes a convenience retail turnover of up to £1.26 million) (**Table 6a** at **Document 4**).
- 5.71 In assessing the potential turnover of the proposed development, it is also important to reiterate that the proposals seek to utilise existing retail floorspace. Whilst the retail goods currently permitted to be sold is restricted to a range of non-food goods only, the existing retail floorspace can already generate a retail turnover. This represents a fallback position when considering the likely trading effects of the proposal.

Existing Offer and Anticipated Trade Diversion

- 5.72 When assessing the trading effects of the proposal, it is important to understand the type of development proposed, and the existing shopping patterns in the local area.
- 5.73 **Table 2** at **Document 4** provides a breakdown of convenience shopping patterns / turnover of existing retail destinations across the City and beyond on a zone-by-zone basis. These have been derived from the findings of the recently completed household survey.
- 5.74 This demonstrates that within Zone 5, where the Application Site is located, the most popular retail destinations are as follows:
- Asda, Lower Dock Street (19.0% market share in Zone 5)
 - Tesco Extra, Harlech Retail Park (18.0%)
 - Asda, Pencarn Way (17.0%)
 - Lidl, Cardiff Road (7.1%)

¹⁰ Derived from GlobalData (2024)

- Sainsbury's, Albany Street (5.1%)
- Aldi, Barrack Hill (5.0%)
- Aldi, Spyttty Road (3.6%)
- Iceland, Commercial Street (3.5%)

5.75 Within the local area, it is evident that convenience shopping trips are principally directed to the large format Asda and Tesco Extra stores, which are in out-of-centre locations except for the Asda on Lower Dock Street.

5.76 In terms of comparison shopping within Zone 5, the most popular destinations are identified to be:

- Newport city centre (24.8% market share in Zone 5)
- Harlech Retail Park, Cardiff Road (13.4%)
- Cardiff city centre (13.2%)
- Newport Road Retail Park district centre (9.0%)
- Mendalgief Retail Park, Docks Way (8.4%)

5.77 It is evident that comparison shopping patterns are directed to the larger centres (such as Cardiff and Newport) together with well established retail parks.

5.78 In addition, it is important to understand the nature of retailer proposed. The application is being pursued to enable Poundland to strengthen their representation in Newport to complement their existing stores in the City Centre (at Friars Walk) and Spyttty Retail Park. As previously highlighted, the proposals are intended to principally serve the residents to the west of the City.

5.79 Existing shopping patterns and the strength and proximity of competing provision has influenced where the proposed development is anticipated to divert its trade.

Impact on Vitality and Viability

5.80 Drawing upon the above, Table 5.4 sets out the anticipated trading effects of the proposals (convenience and comparison goods) on the principal retail destinations in the local area.

Table 5.4: Anticipated Trading Effects of the Proposal – Main Destinations

Destination	Proportion of Proposal's Turnover Derived from Centre / Destination	Impact	
		2028	2031
Commercial Road District Centre	8.1%	-0.7%	-0.7%
Newport City Centre	17.2%	-0.7%	-0.7%
Newport Retail Park District Centre	12.9%	-0.6%	-0.6%
Malpas Road District Centre	1.6%	-0.4%	-0.3%

Source: Table 9 at Document 4

- 5.81 The levels of impact for any defined centre will not be at a level that is likely to undermine the long-term viability and viability of neighbouring centre. Any impact will be limited (-0.7% or less by 2031).
- 5.82 Furthermore, this level of impact does not account for the fact that the Application Site can already be accommodated by a range of retailers. This is not accounted for in the above analysis and demonstrates the assessment undertaken is robust.
- 5.83 Building upon the above analysis, we set out a summary of the trading effects of the proposal on the key centres within the City.

Newport City Centre

- 5.84 Newport city centre is located approximately 2 kilometres northeast of the Application Site and is the principal retail destination in the City. The City Centre comprises a broad range of retail and service uses drawing from a broad catchment.
- 5.85 The retail offer is underpinned by its comparison goods offer, with a mix of national and independent retailers. This includes representation from Sports Direct, Primark, H&M, JD Sports and Boots, a number of which are located within the Friars Walk Shopping Centre. Poundland also recently opened a store within Friars Walk. This follows Poundland's relocation from smaller premises within Kingsway shopping centre elsewhere in the City Centre. As previously highlighted, this investment demonstrates the operator's commitment to Newport. The proposed new store at the Application Site will be in addition to Poundland's existing representation.
- 5.86 The convenience retail offer includes representation from Iceland, M&S Simply Food, Sainsbury's Local and Tesco Express.
- 5.87 Given the existing retail offer, the anticipated trading effects of the proposal will be limited (-0.7% in 2028). Poundland is committed to the retaining a presence in the City Centre.
- 5.88 Furthermore, Newport city centre has a wider 'offer' that includes local services, restaurants and a theatre, which will not be adversely impacted upon by the proposed development.
- 5.89 Overall, the limited levels of impact identified, together with the current role and function of the centre will not be undermined by the application proposal.

Commercial Road District Centre

5.90 Commercial Road district centre is located approximately 1.3 kilometres to the northeast of the Application, to the south of the City Centre.

5.91 Retail activity is focused along Commercial Road, except for the large-format Asda store accessed off Lower Dock Street. Due to its proximity to the City Centre, the retail offer within the District Centre is relatively limited and focused on the independent sector. Instead, the service sector is well represented within the District Centre. Indeed, on considering the role and function of Commercial Road, Paragraph 3.51 of the Newport City Council Retail Study concluded that:

“The previous survey found that services (comprising retail, leisure and financial and business services) accounted for 29.8% of units; this number has risen substantially to 42.4% in the latest survey. The increase in services, linked to the reduction of comparison units, could be considered encouraging for the District Centre in catering to the specific needs of the local population.”

5.92 This important role will not be adversely impacted upon by the allowing Poundland to trade from existing retail floorspace at the Application Site.

5.93 An impact of just -0.7% is identified to fall on the District Centre, this is not deemed to be significant adverse. Indeed, much of this trade diversion is anticipated to be derived from the existing large-format Asda. Our updated assessment identifies that this store is identified to be trading strongly (overtrading by more than £21 million). Given this strong trading performance, even after allowing for the modest diversion to the proposed development, this store will continue to trade above expected levels.

5.94 Overall, the long-term role and function of the District Centre will not be undermined by the application proposals.

Malpas Road District Centre

5.95 Malpas district centre is located approximately 3 kilometres north of the Application Site with commercial activity focused on the busy A4051. Discovery Retail Park, which currently comprises Wickes and Farmfoods (who have occupied the former Aldi who relocated to a new store in Albany Street), forms part of the defined District Centre, which is located a short walk from the traditional ‘high street’ located along Malpas Road.

5.96 In terms of the District Centre’s retail offer, this is relatively limited and is constrained by the centre’s proximity to Newport city centre, which has a strong retail presence. Instead, the District Centre comprises a range of local services (such as hairdressers and fast-food takeaways).

5.97 Reflecting the existing offer, the impact on the District Centre will be limited (-0.4% by 2028). Such a low level of impact will not undermine the long-term vitality and viability of the centre, particularly given the existing fallback position.

Newport Retail Park district centre

- 5.98 The Retail Park is located approximately 4 kilometres east of the Application Site. Although a defined centre, this functions as a standalone retail park and includes representation from Tesco Extra, JD Sports and Next, together with an existing Poundland. Again, this existing Poundland will be retained alongside the proposed development, reflecting the different catchments the two locations serve – one serving residents to the east and one to the west.
- 5.99 Given the strength of the retail park, the low level of impact identified (just -0.6% by 2028) will not undermine the long-term vitality and viability of the District Centre.

Other Centres

- 5.100 Likewise, in terms of any impact on other centres, this will also be limited. This includes Caerleon Road district centre, Goldcroft Common district centre and Cardiff Road local centre.
- 5.101 The anticipated impact (if any) on other defined centres will be negligible. The limited impact identified reflects the relatively limited overlap between the 'offer' of these centres, existing shopping patterns and the nature of retailing proposed.
- 5.102 Overall, there is no evidence to suggest that the proposals will lead to a significant adverse impact on neighbouring centres.

Summary

- 5.103 The application proposals being advanced seek to utilise vacant existing floorspace at a well-established retail destination. The principle of retailing, including the sale of food and drink products in this location is well established.
- 5.104 Despite this, it has been demonstrated that the application proposals satisfy the relevant retail 'tests'. With regard to need, based on updating NCC's existing retail evidence it can be demonstrated that a 'need' (both quantitative and qualitative) can be demonstrated. This is linked to improving the retail offer locally, providing improved choice and competition, reducing the need for residents to travel further afield and to address existing overtrading.
- 5.105 It has also been demonstrated that there is no suitable, viable and available site within a sequentially preferable location that could accommodate the proposals having regard to flexibility, the nature of development, and can address the specific needs the development and can address the specific needs the development is intending to meet.
- 5.106 Whilst the quantum of floorspace subject to this planning application falls below the floorspace threshold when an impact assessment must be required, a proportionate impact assessment has been undertaken for completeness. This demonstrates the proposals will not lead to a significant adverse impact on the vitality and viability of neighbouring centres.

6 Other Planning Considerations

- 6.1 Given the nature of the application proposal (i.e. the modest widening of the existing goods restriction) and its location, there are no other development management issues arising. This includes issues around transport, noise and residential amenity.
- 6.2 Indeed, when considering the previously withdrawn Poundland application at the Retail Park, no objection was raised by the Council's Highway Officer. Likewise, given the site's location within an established retail park Officers concluded that the proposal would not result in an adverse impact on environmental matters or residential amenity.
- 6.3 These conclusions are equally applicable when considering this application.

7 Development Benefits

7.1 This section sets out the headline economic impacts arising from the proposed development. These can be summarised as follows:

- Bringing back into economic use vacant floorspace, alongside ensuring the long-term occupancy of existing retail floorspace.
- The proposals will increase the employment opportunities available to the local community (creating around jobs in the local area) and an investment into the local economy. This level of job creation is significant and there will be tangible positive impact on local employment. Poundland seek to reach out to local residents when recruiting staff for their store. Therefore, the area within which the new store is proposed could harness significant benefits from the new retail employment opportunities that it will bring. This could have a positive impact in the local area given that the Pillgwenlly Ward (where the Application Site is located) has the highest proportion of economically inactive residents in Newport¹¹.
- The increase in employment will make an economic contribution in terms of Gross Value Added (GVA).
- If approved, the proposals also demonstrate continued investor confidence in Newport by a leading national retailer (Poundland), who have recently invested elsewhere in the City, with a new store at Friars Walk in the City Centre.
- The reoccupation of existing retail floorspace, which has been vacant since 2019 will lead to an increase in business rates some of which can be available to NCC.
- The proposals will also increase retail choice locally in a sustainable location. Poundland is a discount retailer selling quality items at low prices. Affordable access to good quality items is important given the ongoing cost-of-living issues that people throughout the UK are increasingly facing.

7.2 These economic benefits should be afforded significant weight in the determination of the application, particularly given the proposal's conformity with relevant planning policy.

¹¹ Newport Community Well-being Profile 2021

8 Summary and Conclusions

- 8.1 This PSRIA has been prepared on behalf of Newport Lux S.A.R.L in support of proposals at 28 East Retail Park, Docks Way, Newport.
- 8.2 The application is a good news story for Newport, which is being pursued following confirmed interest from Poundland to further invest in the City. This additional investment follows the opening of their new store within the Friars Walk, which has recently opened. The application proposals, whilst modest in nature, will deliver substantial benefits, including job creation and investment, alongside bringing back in active use a longstanding vacant unit.
- 8.3 The principle of retail development on the Application Site, including the sale of food and drink products, is well established. Indeed, NCC granted planning permission for a similar application in August 2018¹², which enabled The Food Warehouse to trade from Unit 2.
- 8.4 Significantly, the Application Site does not comprise a new retail floorspace but simply seeks to utilise existing floorspace by seeking a widening of the existing goods restriction. The proposed widening of the existing goods restriction is entirely acceptable in principle. The proposals fully comply with the development management policies in which the proposals are assessed against both national and local planning policy level.
- 8.5 Indeed, a retail need can be demonstrated, and no sequentially preferable site exists that is available, suitable and viable to accommodate the proposed development and meet the need the new Poundland is intending to serve. It has also been demonstrated that the application proposals will not lead to a significant adverse impact that will undermine the long-term vitality and viability of neighbouring centres.
- 8.6 For all the reasons set out within this report and supporting documents, the proposals comprise a sustainable economic development, the principle of which is supported by national and local planning policy.

¹² Ref. 18/0422



Document 1

Letter of Support from Poundland

Head of Planning
Regeneration, Investment and Housing
Newport City Council
Civic Centre
Newport
NP20 4UR

18th May 2023

Dear Sir / Madam,

Planning Application to Widen the Range of Goods Sold from Unit 6, 28 East Retail Park, Docks Way, Newport NP20 2NN

I refer to the above proposals and the forthcoming planning application to widen the goods restriction at Unit 6 of 28 East Retail Park, Newport. Poundland has agreed Heads of Terms to lease Unit 6 which has a gross internal area of 1,302 square metres. To trade from this unit, Poundland requires a widening of the goods allowed to be sold for us to sell our full product range.

If the planning application is successful, this will be Poundland's third store in Newport to complement our existing stores at Newport Retail Park, which serves the east of the City, and the recently opened new store at Friars Walk in the City Centre, which opened in January 2023 and extends to 10,366 sq ft. This new City Centre store, where we are committed to a lease for at least 5 years, replaced a smaller store on Commercial Street, which was too small (at just 214 square metres at ground floor) to provide the full offer now expected by our customers. This new store represents a substantial investment in the City Centre and our confidence in it as a retail destination.

Poundland is committed to Newport as a retail destination. This is demonstrated by our recent and substantial investment in the City Centre. However, due to the strong market in Newport for our product range and keen prices, we are seeking a third store to cater for the expanding market.

As we are already represented in the City Centre and in the east of the City at Newport Retail Park, we require a retail warehouse format store to serve residents in the west of the City. Given this need, we have been actively searching for potential premises within Newport. This search has demonstrated that there opportunities are extremely limited, with the only suitable location being at 28 East Retail Park. The existing unit is of an appropriate size to accommodate our needs and can be fitted out to our specification. As the new store will serve a different catchment area than the two existing stores, the store at 28 East Retail Park will complement rather than compete directly with existing stores. We do not sell any products that are not already available in the city centre and the opening of the store will allow Poundland to meet strong demand of its customers and grow the business as a whole.

We will be making a significant capital investment in this project creating in the region of 40 new jobs across a range of roles. As is normally the case with retail positions, it is anticipated that most of these roles will be filled by local residents as is the case with our other stores.

Poundland Limited, Customer Support Centre
Midland Road, Walsall, West Midlands, WS1 3TX, UK
Telephone: +44 (0)121 568 7000
Fax: +44 (0)121 568 7007
www.poundland.com

We therefore provide full support to the planning application and reiterate the fact that this store will complement our existing stores. There are no other suitable units available which would be at an acceptable cost, and which would meet our operating requirements. As such, if the application is not successful, then Poundland cannot invest further in Newport.

We hope that the planning application will be successful as we are very much looking forward to opening this store.

Yours faithfully,



PP Chris Sumner
Acquisitions Manager Retail Parks



Document 2

Site Location Plan



Drawing Title	Site Location Plan
Drawing Reference	Q50283 Rev 01
Scale	1:1250 @ A4
Address	Unit 6, 28 East Retail Park, Docks Way, Newport, NP20 2NN



Document 3

Relevant Planning History

Notice of Decision

TOWN AND COUNTRY PLANNING ACT 1990

To

HLN ARCHITECTS LTD
WESTGATE COURT
WESTGATE STREET
CARDIFF
CF10 1XX

Application number 00/0760



Application Type FULL

Proposal DEVELOPMENT OF 6/7 RETAIL UNITS AND A FAST FOOD OUTLET

Site/location LAND ADJOINING DOCKS WAY MAESGLAS NEWPORT

In pursuance of its powers under the above Act, the Council of the County Borough of Newport notifies you of its decision in respect of your application, registered by them on 05/07/2000. The application has been

GRANTED WITH CONDITIONS

STANDARD CONDITIONS

The development must begin not later than the expiration of **five years** from the date of this permission
Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990

ADDITIONAL CONDITIONS

01 No use shall be made of any unit until the footpaths, crossing points, parking, loading and access areas within the site have been provided and surfaced as shown on plan (20)200P, and individual parking spaces marked on the surface

Reason: To ensure that adequate parking provision is made off the highway in the interests of road safety

02 Notwithstanding the information accompanying the application hereby approved, no work shall be commenced on the construction of the approved scheme until details/samples of materials and finishes to be used on the external surfaces have been submitted to and approved in writing by the Local Planning Authority

Reason: To ensure the development is completed in a manner compatible with its surroundings

03 Within 3 months of the development commencing, approval of the Local Planning Authority is required to a scheme of landscaping and tree planting for the site (indicating inter alia the number, species, heights on planting and position of all shrubs). Such scheme as approved shall be carried out in its entirety by a date not later than the end of the full planting season immediately following the completion of that development. Thereafter, the trees and shrubs shall be adequately maintained for a period of 5 years from the date of planting and any which die or are damaged shall be replaced and maintained until satisfactorily established. For the purposes of this condition, a full planting season shall mean the period from October to April.

Reason: To safeguard the rights of control of the Local Planning Authority in these respects and to ensure that the site is landscaped in a satisfactory manner

04 Surface water drainage should be connected to the surface water system via a suitable petrol/oil interceptor in accordance with details to be first agreed in writing by the Local Planning Authority

Reason: To prevent pollution of the drainage system

05 None of the proposed retail units shall commence trading until access arrangements onto Docks Way have been fully implemented in accordance with approved plan 99232/51H

Reason: In the interests of highway safety and efficient functioning of the site

06 Prior to work first commencing on site, full details of access arrangements for construction traffic shall be agreed with the Local Planning Authority and all vehicles operating on the site shall then accord with these details

Reason: In the interests of highway safety

07 The units identified as 02, 03, 04, 05 and 06/07, as shown on plan (20)200P, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987

Reason: To restrict the range of goods available from the units to protect the vitality and viability of the town centre

08 The unit identified as 01 on plan (20)200P shall not exceed 9295 square metres of gross floorspace, including a 400 square metre ancillary café. The remainder of the floorspace including the 700 square metre garden centre shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings and the following

No more than 1,000 square metres of retail floorspace shall be used for the sale of adults clothing and footwear

No more than 630 square metres of retail floorspace shall be used for the sale of childrens clothing and footwear

No more than 830 square metres of retail floorspace shall be used for the sale of toys/sports equipment

No more than 740 square metres of retail floorspace shall be used for the sale of stationery, books and cards

No more than 740 square metres of retail floorspace shall be used for the sale of health and beauty products

No more than 550 square metres of retail floorspace shall be used for the sale of entertainment goods (CD's and videos), seasonal and novelty products

No more than 400 square metres of retail floorspace shall be used for the sale of confectionery and snacks

No more than 150 square metres of retail floorspace shall be used for the sale of household consumables

The building shall not be used for the sale of food or drink (other than confectionery and snacks)

Reason: To restrict the range of goods available from the unit to protect the vitality and viability of the town centre

Notice of Decision



09 The slab levels of the proposed buildings shall be a minimum of 9.8 AOD. Sections through the site at ten metre intervals showing existing and proposed levels shall be submitted to and approved by the Local Planning Authority prior to the commencement of development

Reason: To protect the buildings from possible flooding

10 Prior to work first commencing on site, full details, including sections, of storm water drainage lakes shall be submitted to and approved by the Local Planning Authority

Reason: To protect drainage interests

11 No plant or equipment shall be installed on the roof of the building approved without the prior written permission of the Local Planning Authority

Reason: To ensure that the appearance of the building will be satisfactory

12 Prior to the first use of the units hereby approved, the fences, walls and screens shown on the approved plan shall be erected and retained in perpetuity

Reason: To ensure a satisfactory form of development

13 No goods, materials, waste products or containers shall be stored outside any buildings erected pursuant to this permission without the prior written consent of the Local Planning Authority

Reason: In the interests of visual amenities

14 Prior to work first commencing on site, full details of the proposed sub stations shall be submitted to and approved by the Local Planning Authority

Reason: To ensure a satisfactory form of development

15 All service vehicles shall access the site via West Way Road

Reason: In the interest of highway safety

16 The cycle parking provision shown on plan (20)200P shall be provided prior to the first use of any unit

Reason: In order to ensure that adequate cycle parking facilities are provided

17 No units, caravans or vehicles displaying or selling food or other goods shall be located within the car parking area without the prior written consent of the Local Planning Authority

Reason: In order to ensure that the parking provision within the site is safeguarded

18 Prior to the commencement of development, details of foul drainage should be submitted to and approved in writing by the Local Planning Authority

Reason: To prevent pollution of the water environment

19 The remediation strategy detailed in the Ground Investigation Report (October 2000) and letter dated 1 November 2000 shall be carried out in its entirety prior to the completion of the development. Notwithstanding the submitted information, details of the location and type of ventilation to be provided shall be first submitted to and approved in writing by the Local Planning Authority

Reason: To safeguard the interests of future users of the site and to ensure that an acceptable system is provided

20 On completion of the works of remediation the applicant shall provide a certification report, compiled by a suitably qualified engineer who has supervised the works, which confirms that the remediation works have been completed fully in accordance with the approved remediation strategy

Reason: To ensure that the remediation strategy is effectively implemented in the interest of residential amenities and to safeguard the interests of future users of the site

21 No material, other than that expressly allowed by this permission, shall be tipped or stored within 7 metres of any watercourse, ditch or spring

Reason: In order to protect the drainage system

22 Prior to work commencing on site full details of a detailed method statement regarding construction works, including details of wheelwash facilities, dust suppression, protection of the water environment and trees to be protected shall be submitted to and approved in writing by the Local Planning Authority, and the development shall then be undertaken fully in accordance with the details as agreed

Reason: To protect residential amenity and the natural environment

NOTE TO APPLICANT

The development should be carried out fully in accordance with the proposals shown in the application and in the plans and particulars accompanying such application as varied and amended by this permission

This decision notice is in respect of **Planning Permission** and does not convey any decision which may be required under The Building Regulations

This decision relates to plan Nos (20)200P, FF(20)200, 90-200D, 204928 01/1D, 68-100B, (20)201G, (20)202D, 20-203E, (20)212E, (20)223E, (20)224E, (21)412C, (21)500, 99232/79, 99232/51H, Movement Impact Assessment (4003/1C), Retail Impact Assessment (204928(i) dated July 2000 and additional information received on 6 November 2000 and 29 November 2000, Ground Investigation Report dated October 2000 with letter dated 1 November 2000 and plans 99232/14C, 99232/13C

Signed on behalf of the Council

Newport County Borough Council

Head of Planning and Economic Regeneration

Civic Centre
Newport
South Wales
NP20 4UR

Application No 00/0760

Decision Date 19/09/2001

IMPORTANT! PLEASE READ THE NOTES ON THE REVERSE OF THIS FORM

TOWN AND COUNTRY PLANNING ACT 1990

RAPLEYS LLP
9TH FLOOR,
CLIFTON HEIGHTS
CLIFTON
BRISTOL
BS8 1EJ

Application No: **08/0936**

Application Type: **Full**

Proposal: **CHANGE OF USE TO PROVIDE FOR THE SALE OF GOODS WITHIN USE CLASS A1 PREVIOUSLY RESTRICTED**

Site/Location: **UNIT 6A TO 6B 28 EAST RETAIL PARK DOCKS WAY NEWPORT SOUTH WALES NP20 2NW**

Decision Date: **14/08/2008**

In pursuance of its powers under the above Act the Council of the City of Newport notifies you of its decision in respect of your application, registered by them on 21/07/2008. The application has been:-

Granted with Conditions

STANDARD CONDITIONS

The development must begin not later than the expiration of **FIVE YEARS** from the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

ADDITIONAL CONDITIONS

(1)The unit known as Unit 6 and identified on the plans hereby approved, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, office supplies, office equipment/technology, and ancillary uses (including a print shop, copy centre, service centre for office equipment, technology centre and limited customer refreshments, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987.

Reason: To restrict the range of goods available from the units to protect the vitality and viability of the town centre.

(2)No goods, materials, waste products or containers shall be stored outside any buildings erected pursuant to this permission without the prior written consent of the Local Planning Authority.

Reason: In the interests of visual amenities.

(3) All service vehicles shall access the site via West Way Road.

Reason: In the interest of highway safety.

NOTE TO APPLICANT

The development shall be carried out fully in accordance with the proposals shown in the application and in the plans and particulars accompanying such application as varied and amended by this permission.

This decision notice is issued in respect of Planning Permission only and does not convey any decision which may be required under any other legislation or provisions, such as the Building Regulations. For advice on the requirements of the Building Regulations and allied legislation, and/or whether there is a need for a Building Regulations submission, please contact the Council's Building Control Section on 01633 414504 or 01633 414505 or email building.control@newport.gov.uk.

(1)This decision relates to plan Nos: Site Location Plan (1), Block Plan (1), access statement July 2008 (703/51/4), retail assessment July 2008 (703/51/4), submission letter (ELJ/AAK/703/54/1).

(2)The development plan for Newport is the Newport Unitary Development Plan 1996 – 2011 (Adopted May 2006). Policy R12 was relevant to the determination of this application.

Signed on behalf of the Council

Newport City Council
Environment and the Economy
Civic Centre
NEWPORT
South Wales
NP20 4UR

Stewart Wild
Head of Planning and Economic Regeneration

Application Number: **08/0936**

Decision Date: **14/08/2008**

IMPORTANT! PLEASE READ THE NOTES ON THE REVERSE OF THIS FORM

Notice of Decision



Tim Rainbird
Quod
Ingeni Buildings
17 Broadwick Street
London
W1F 0DA

TOWN AND COUNTRY PLANNING ACT 1990 [as amended]

Application No: **18/0422**

Application Type: **Renewals and Variation of Conditions**

Proposal: **VARIATION OF CONDITION 07 (RESTRICTION OF USE) FOR PLANNING PERMISSION 00/0760 TO INCLUDE UNIT 02 (AS IDENTIFIED ON PLAN REF Q01) MAY ALSO BE USED FOR THE SALE OF FOOD AND DRINK (CLASS A1). UP TO 20 PERCENT OF THE FLOOR SPACE CAN BE USED FOR THE SALE OF ANCILLARY COMPARISON GOODS**

Site/Location: **Unit 2 28 East Retail Park, Docks Way, Newport, NP20 2NW**

Decision Date: **16-Aug-2018**

In pursuance of its powers under the above Act the Council of the City of Newport notifies you of its decision in respect of your application, registered by them on 04-May-2018. The application has been:-

Granted with Conditions

STANDARD CONDITIONS

- (a) The development to which this permission relates must be begun not later than the expiration of **FIVE YEARS** from the date of this permission.

Reason: To conform to the requirements of Sections 91 and 92 of the Town and Country Planning Act 1990.

ADDITIONAL CONDITIONS IMPOSED BY THE COUNCIL

- The units identified as 02, 03, 04, 05 and 08, as shown on plan No 703/67/5_1 of planning permission 00/0760, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987.
Reason: To restrict the range of goods available from the units to protect the vitality and viability of the City Centre.
- The unit known as Unit 6 and identified on plan No 703/67/5_1 of planning permission 00/0760, shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings, office supplies, office equipment/technology, and ancillary uses (including a print shop, copy centre, service centre for office equipment, technology centre and limited customer refreshments, and for no other purpose whatsoever, including any other purpose set out in Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987.
Reason: To restrict the range of goods available from the units to protect the vitality and viability of the City Centre.
- The use hereby approved in relation to Unit 7 as identified on the plan No 703/67/5_1 of planning permission 00/0760 shall inure for the benefit of JJB Sports only and the retail use should be restricted to the proposed mezzanine level unless otherwise first agreed in writing by the Local Planning Authority.
Reason: To control future use and occupation of the building in order to protect the vitality and viability of the City Centre.
- The retail use hereby approved in relation to Unit 7 shall be operated in conjunction with the associated health and fitness centre shown on the plans approved under Application No 03/1340 only, and shall not be sub-divided or trade independently unless otherwise first agreed in writing by the Local Planning Authority.

Reason: To control future use and occupation of the building in order to protect the vitality and viability of the City Centre.

5. The retail use in relation to Unit 7 shall be limited to a maximum of 1,300sqm floorspace, and of this floorspace not less than 50% shall be used for the sale, display and testing of sports equipment with a maximum of 650sqm being used for the display and sale of non bulky sports product and goods.

Reason: To protect the vitality and viability of the City Centre and other district centres.

6. The unit identified as 04 on plan No 703/67/5_1 of planning permission 00/0760 shall not exceed 720 square metres of net floor space. The floor space shall only be used for the following:
- no more than 634 square metres of retail floorspace shall be used for the sale of toys, bicycles and sports goods;
 - no more than 72 square metres of retail floorspace shall be used for the sale of seasonal goods, novelty items and some stationery (ie Christmas cards);
 - no more than 7 square metres of retail floorspace shall be used for the sale of confectionery/snacks;
 - no more than 7 square metres of retail floorspace shall be used for the sale of DVDs.

Reason: To restrict the range of goods available from the unit to protect the vitality and viability of the City Centre.

7. The unit identified as 01A and 01B on plan 703/67/5_1 of planning permission 00/0760 shall not exceed 9295 square metres of gross floorspace, including a 400 square metre ancillary café. The remainder of the floorspace including the 700 square metre garden centre shall only be used for the sale of DIY products (including building materials, kitchen and bathroom fittings, garden materials and goods), vehicle goods and accessories, furniture, carpets and floor coverings, electrical household goods, and household furnishings and the following:
- no more than 1,000 square metres of retail floorspace shall be used for the sale of adults clothing and footwear;
 - no more than 630 square metres of retail floorspace shall be used for the sale of children's clothing and footwear;
 - no more than 196 square metres of retail floorspace shall be used for the sale of toys/sports equipment;
 - no more than 740 square metres of retail floorspace shall be used for the sale of stationery, books and cards;
 - no more than 740 square metres of retail floorspace shall be used for the sale of health and beauty products;
 - no more than 471 square metres of retail floorspace shall be used for the sale of entertainment goods (CD's and videos), seasonal and novelty products;
 - no more than 393 square metres of retail floorspace shall be used for the sale of confectionery and snacks;
 - no more than 150 square metres of retail floorspace shall be used for the sale of household consumables.

The building shall not be used for the sale of food or drink (other than confectionery and snacks).

Reason: To restrict the range of goods available from the unit to protect the vitality and viability of the City Centre.

8. In addition to the range of goods specified at condition 01 of this permission, unit 02 (as identified on plan reference Q01) shall be used for the sale of convenience goods with a net floor area no greater than 850sqm. Ancillary non-food retailing shall not exceed 170sqm of the net floor area of the unit.

Reason: To restrict the range of goods available from the units to protect the vitality and viability of defined commercial centres.

9. At no time shall the unit identified as unit 02 on plan Q01 be subdivided.

Reason: To protect the vitality and viability of defined commercial centres.

10. No goods, materials, waste products or containers shall be stored outside any buildings erected pursuant to this permission without the prior written consent of the Local Planning Authority.

Reason: In the interests of visual amenities.

11. No plant or equipment shall be installed on the roof of the building approved without the prior written permission of the Local Planning Authority.

Reason: To ensure that the appearance of the building will be satisfactory.

12. All service vehicles shall access the site via West Way Road.

Reason: In the interest of highway safety.

13. No units, caravans or vehicles displaying or selling food or other goods shall be located within the car parking area without the prior written consent of the Local Planning Authority.

Reason: In order to ensure that the parking provision within the site is safeguarded.

14. No material, other than that expressly allowed by Planning Permission 00/0670, shall be tipped or stored within 7 metres of any watercourse, ditch or spring.

Reason: In order to protect the drainage system.

NOTE TO APPLICANT

The development should be carried out fully in accordance with the proposals shown in the application and in the plans and particulars accompanying such application as varied and amended by this permission.

This decision notice is issued in respect of Planning Permission only and does not convey any decision which may be required under any other legislation or provisions, such as the Building Regulations. For advice on the requirements of the Building Regulations and allied legislation, and/or whether there is a need for a Building Regulations submission, please contact the Council's Building Control Section on 01633 656656 or email building.control@newport.gov.uk

1. This decision relates to plan Nos: Planning and Retail Statement – Amended 08/05/ 2018, Site Location Plan Q01, PRS Documents 1-9 and Transport Statement.
2. The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Policies SP1 (Sustainability), SP18 (Urban Regeneration), SP19 (Assessment of Retail Need), GP3 (Service Infrastructure), GP4 (Highways and Accessibility), T4 (Parking), R11 (Development of Existing Out-of-Centre Retail Sites) and W3 (Provision for Waste Management Facilities in Development) were relevant to the determination of this application.
3. Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.

The plans have been assessed on the basis of the scale or dimensions stipulated and any statement of 'do not scale' (or similar) has been disregarded.

Where there are conditions which require details to be approved prior to the commencement of development, failure to submit these details prior to commencement of development may result in the permission being invalidated.

The Local Planning Authority has a target to determine Discharge of Condition applications within 8 weeks of receipt of the details, and so you are advised to programme any work accordingly.

Signed on behalf of the Council

Newport City Council
Regeneration, Investment and Housing
Civic Centre
NEWPORT
South Wales
NP20 4UR



Keir Duffin
Head of Regeneration, Investment and Housing / Pennaeth Adfywio Buddsoddi a Thai
Cyngor Dinas Casnewydd / Newport City Council

Application Number: 18/0422

Decision Date: 16-Aug-2018

IMPORTANT! PLEASE READ THE NOTES ON THE REVERSE OF THIS FORM



Notes for Applicants

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Welsh Government

If you are aggrieved by the decision of your Local Planning Authority to refuse an application or to grant it subject to conditions, you can appeal to the Welsh Government under Section 78 of the Town and Country Planning Act 1990 (as amended).

If you want to appeal against your local planning authority's decision then you must do so within 6 months of the date of this notice. However, if you are appealing against a decision relating to a householder or minor commercial development the time limit for lodging the appeal is 12 weeks.

Appeals must be made using a form which you can get from the Welsh Government, Planning Inspectorate at Crown Buildings, Cathays Park, Cardiff CF10 3NQ, or online at www.planningportal.gov.uk/pcs

The Welsh Government can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Welsh Government will not consider an appeal if it seems that the Local Planning Authority could not have granted permission for the proposed development or could not have granted it without the condition they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Welsh Government does not refuse to consider appeals solely because the Local Planning Authority based its decision on a direction given by them.

The Choice of Appeal Procedure

The appeal procedures available are:

- a) by written representations which you and the Local Planning Authority make, normally followed by an unaccompanied site inspection
- b) by Hearing, when both parties make oral representations to an Inspector appointed by the Welsh Government. A Hearing is conducted on a less formal basis than a Public Inquiry.
- c) by Public Inquiry which takes the form of a formal hearing by an Inspector appointed by the Welsh Government.

Purchase Notices

If either the Local Planning Authority or the Welsh Government refused planning permission or listed building consent or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor can he render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the local planning authority in whose area the land is situated.

This Notice will require the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990. (The Local Planning Authority may accept the notice and proceed to acquire the land; or reject the notice in which case they must refer the notice to the Welsh Government.)



Document 4

Retail Analysis

Table 1a: Population by Zone within Study Area

Zone	2025	2028	2031
1	37,010	37,587	38,106
2	8,809	8,929	8,994
3	43,443	44,182	44,902
4	25,416	25,908	26,392
5	24,042	24,562	25,033
6	6,600	6,742	6,885
7	19,713	20,117	20,407
Total	166,033	168,027	170,719

Notes:
1. Population derived from Experian Location Analyst (2024)

Table 1b: Convenience and Comparison Expenditure per person in Study Area

	1	2	3	Zone (£) 4	5	6	7
Convenience Goods							
2022	2,225	2,662	2,075	2,321	2,047	2,572	2,408
2022 (excl. SFT)	2,116	2,532	1,974	2,208	1,947	2,446	2,290
2025	2,022	2,419	1,886	2,109	1,860	2,337	2,188
2028	2,007	2,402	1,873	2,095	1,847	2,321	2,173
2031	2,001	2,395	1,867	2,088	1,842	2,314	2,166
Comparison Goods							
2022	3,008	3,931	2,673	3,319	2,723	4,062	3,645
2022 (excl. SFT)	2,298	3,003	2,042	2,536	2,081	3,104	2,785
2025	2,202	2,877	1,957	2,430	1,994	2,973	2,668
2028	2,373	3,102	2,109	2,619	2,149	3,205	2,876
2031	2,544	3,324	2,260	2,807	2,303	3,435	3,082

Notes:
1. Derived from Experian Location Analyst (2024). Allowance for Special Forms of Trading and forecasts in line with the latest expenditure estimated identified by Experian (Retail Planner Briefing Note 21, February 2024)
2. At 2021 prices

Table 1d: Total Convenience Expenditure Split (2025)

	1	2	3	Zone (£m) 4	5	6	7
Available Expenditure	74.82	21.31	81.93	53.61	44.73	15.43	43.13
Main - Principal (£m)	39.28	11.19	43.01	28.15	23.48	8.10	22.64
Main - Other (£m)	16.83	4.79	18.43	12.06	10.06	3.47	9.70
Top-up - Principal (£m)	13.09	3.73	14.34	9.38	7.83	2.70	7.55
Top-up - Other (£m)	5.61	1.60	6.14	4.02	3.35	1.16	3.23

Notes:
1. Available expenditure derived from Table 1c
2. Main / top-up split based on 75% : 25% split as agreed with Nexus Planning during pre-application discussions
3. Principal / other split based on 70% : 30% split
4. At 2021 prices

Table 1c: Total Convenience and Comparison Retail Expenditure in Study Area

	1	2	3	Zone (£m) 4	5	6	7	Total (£m)
Convenience Goods								
2025	74.82	21.31	81.93	53.61	44.73	15.43	43.13	334.96
2028	75.46	21.45	82.74	54.27	45.38	15.65	43.71	338.65
2031	76.27	21.54	83.84	55.12	46.11	15.93	44.20	343.01
Comparison Goods								
2025	81.49	25.35	85.00	61.75	47.93	19.62	52.60	373.74
2028	89.21	27.69	93.18	67.85	52.78	21.61	57.86	410.19
2031	96.92	29.89	101.48	74.07	57.65	23.65	62.90	446.57

Notes:
1. Expenditure = Table 1a x Table 1b
2. At 2021 prices

Table 1e: Total Comparison Expenditure Split (2025)

	1	2	3	Zone (£m) 4	5	6	7
Available Expenditure	81.49	25.35	85.00	61.75	47.93	19.62	52.60
Clothes, footwear, fashion (£m)	22.25	6.39	23.66	16.30	13.52	4.66	13.00
Furniture, floor coverings (£m)	13.89	4.16	14.42	10.11	7.84	3.44	8.84
DIY (£m)	4.84	1.69	4.76	4.02	2.63	1.37	3.31
Domestic Appliances (£m)	11.18	3.27	12.18	8.32	6.85	2.56	7.00
Audio-visual (£m)	5.96	1.65	5.90	3.91	3.35	1.26	3.51
Health & Beauty (£m)	3.76	1.38	3.53	2.76	1.99	0.97	2.59
Small household goods (£m)	3.04	0.93	3.16	2.22	1.86	0.68	1.86
Toys, games, recreation goods (£m)	11.18	4.27	11.96	10.22	6.88	3.47	9.28
Books, CDs, DVDs	5.40	1.61	5.43	3.89	3.01	1.21	3.21

Notes:
1. Available expenditure derived from Table 1c
2. Expenditure splits for different categories derived from Experian Location Analyst
3. At 2021 prices

Notes:

1. Available expenditure derived from Table 1c
2. Market shares derived from Neaseport Household Survey (November 2022)
3. Turnover derived from Zones 8-14 derived from the Neaseport Retail and Leisure Study Addendum (2023) and turnover derived from elsewhere based on Quod estimates
4. At 2021 prices

Table 3: Trading Performance of Existing Convenience Retail Facilities (Overall Study Area)

Facilitation	Survey Derived Turnover (\$m)	Net Convenience FloorSpace (square metres)	Sales Density (£ per square metre)	Expected Turnover (\$m)	Over / underturning 2025 (\$m)	1 (\$m)	2 (\$m)	3 (\$m)	Turnover by Zone within Study Area 4 (\$m)	5 (\$m)	6 (\$m)	7 (\$m)	8 (\$m)	9 (\$m)	10 (\$m)
Regional Development															
Newport City Centre (Zone 1)															
Indirect, Commercial Street**	13.45	540	5,869	3.16	10.20	6.08	0.41	1.08	1.06	1.58	0.13	0.00	12.34	1.11	0.36
M&S, Friars Walk Shopping Centre***	5.21	436	8,058	3.89	1.31	1.36	0.05	1.82	0.10	0.82	0.05	0.06	4.84	1.01	0.08
Barclays's Local, Sovereign Arcade, John Frost Square	1.08	223	11,290	2.52	-1.43	0.96	0.00	0.01	0.00	0.04	0.00	0.00	1.01	0.00	0.00
Texaco Express, Cardenham Road***	0.60	227	13,185	0.21	-2.31	0.00	0.00	0.00	0.35	0.00	0.35	0.00	0.44	0.00	0.00
Other	0.95			0.95	0.00	0.95	0.00	0.04	0.14	0.24	0.00	0.00	0.83	0.12	0.00
Sub-total	21.38	1,426	-	13.52	7.86	8.94	0.66	4.21	1.89	2.68	0.17	0.06	18.66	1.72	0.44
Malpas District Centre (Zone 1)															
Asda, Barnack Hill, Southbury Street****	16.72	679	12,591	8.95	10.17	10.54	0.09	2.16	1.87	2.22	0.75	0.00	17.82	0.86	0.00
Other	0.00			0.02	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.02	0.00	0.00
Sub-total	16.72	679	-	8.97	10.17	10.54	0.09	2.16	1.87	2.23	0.75	0.00	17.84	0.89	0.00
Cardenham District Centre (Zone 2)															
Cardenham Road District Centre (Zone 3)															
Spar, Cardenham Road***	0.73	234	8,376	1.96	-1.23	0.00	0.30	0.42	0.00	0.00	0.00	0.00	0.73	0.00	0.00
Texaco Express, Cardenham Road***	2.52	195	13,186	2.57	-0.04	0.37	0.00	0.00	0.36	0.00	0.00	0.17	2.82	0.00	0.00
Other	0.61			0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.61	0.00	0.00
Sub-total	3.76	429	-	3.04	0.72	0.37	0.30	0.42	0.75	0.00	0.00	0.17	3.76	0.00	0.00
Beaulywood District Centre (Zone 3)															
Spar, Chapeltown Road	0.15			0.15	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00	0.15	0.00	0.00
Co-op Store, Cheltenham Road****	1.52	185	11,219	2.98	-2.76	0.00	0.00	0.00	1.32	0.00	0.00	0.00	1.32	0.00	0.00
Sub-total	1.67	185	-	2.22	-2.76	0.00	0.00	0.00	0.15	0.00	0.00	0.00	1.47	0.00	0.00
Goldsborough Common District Centre (Zone 2)															
Barclays's Local, Goldsborough Common	2.31	208	11,290	2.33	-0.01	0.06	2.12	0.00	0.00	0.00	0.00	0.14	2.31	0.00	0.00
Other	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sub-total	2.31	208	-	2.33	-0.01	0.06	2.12	0.00	0.00	0.00	0.00	0.14	2.31	0.00	0.00
Coronation Road District Centre (Zone 3)															
Marston District Centre (Zone 3)															
Newport Retail Park District Centre (Zone 4)															
Indirect, Newport Retail Park, Sperry Road	2.08	325	5,869	1.90	1.68	0.00	0.14	1.49	0.81	0.00	0.00	0.10	2.54	0.44	0.00
M&S, Newport Retail Park, Sperry Road	1.97	789	8,058	7.05	-1.08	0.00	0.83	0.78	1.31	0.13	0.03	0.00	4.06	1.92	0.00
Texaco Extra, Sperry Road****	33.53	3,080	13,186	40.61	-7.09	2.01	1.41	8.79	12.37	0.27	0.02	0.00	28.79	7.74	0.00
Asda, Sperry Road** (not at capacity)	28.48	787	12,591	9.66	18.00	0.00	0.36	0.00	1.13	0.00	0.36	0.00	19.12	8.90	0.00
Home Bargains, Newport Retail Park	0.03			0.03	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.02	0.00	0.00
Flourens, Newport Retail Park, Newport	0.86			0.86	0.00	0.00	0.00	0.55	0.00	0.00	0.00	0.00	0.85	0.11	0.00
Other	0.74			0.74	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.83	0.11	0.00
Sub-total	72.39	4,881	-	66.65	11.74	3.19	4.24	19.28	32.32	2.69	0.87	1.46	53.07	18.32	0.00
Commercial Road District Centre (Zone 5)															
Asda, Lower Dock Street, Pilywenny, Newport**	46.87	2,809	9,077	25.40	21.16	11.16	0.61	13.65	5.06	8.46	0.65	0.00	38.72	6.95	0.00
Other	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sub-total	46.73	2,809	-	25.40	21.16	11.16	0.61	13.65	5.06	8.46	0.65	0.00	38.72	6.95	0.00
Bottes Local Centre (Zone 1)															
Spar, Bottes Shopping Centre**	1.40	139	8,376	1.16	0.32	1.49	0.00	0.00	0.00	0.00	0.00	0.00	1.49	0.00	0.00
Other	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sub-total	1.40	139	-	1.16	0.32	1.49	0.00	0.00	0.00	0.00	0.00	0.00	1.49	0.00	0.00
Malpas Road Local Centre (Zone 1)															
Texaco Express, Malpas Road	1.56	224	13,186	2.95	-1.39	1.18	0.00	0.00	0.00	0.38	0.00	0.00	1.86	0.00	0.00
Other	0.41			0.41	0.00	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.41	0.00	0.00
Sub-total	1.97	224	-	2.36	-1.39	1.51	0.00	0.00	0.38	0.38	0.00	0.00	1.87	0.00	0.00
Cardiff Road Local Centre (Zone 5)															
Cardiff Road Local Centre (Zone 6)															
Clytha Park Road Local Centre (Zone 1)															
Texaco Express, Clytha Park Road	1.75	224	13,186	2.95	-1.21	1.75	0.00	0.00	0.00	0.00	0.00	0.00	1.75	0.00	0.00
Barnham Way, Cardenham Local Centre (Zone 2)															
Barnham Way, Cardenham Local Centre (Zone 3)															
Clevedon Local Centre (Zone 3)															
Clarence Place Local Centre (Zone 3)															
Island, Clarence Place (now closed)															
Local Drive, Bessing Local Centre (Zone 7)															
Edge of / Out of Centre															
Asda, Udd Way (Zone 1)*	5.46	623	5,869	3.62	1.85	2.43	0.20	1.35	0.20	0.74	0.00	0.15	5.08	0.38	0.00
Barclays's, Albany Street, Newport (Zone 1)**	40.79	4,236	11,290	40.45	-4.86	10.45	4.29	11.21	3.17	0.88	0.76	0.00	32.24	8.84	0.00
Morrisons, Old Drive, Newport (Zone 4)***	12.54	2,089	8,060	18.76	-2.22	1.50	0.12	0.36	0.31	0.00	0.00	0.00	12.84	0.00	0.00
Asda, Pencrean Way, Cardenham, Duffryn, Newport (Zone 5)***	25.56	3,527	9,077	30.20	-4.64	0.04	0.20	2.81	0.54	7.60	4.51	0.00	26.05	5.51	0.00
Home Bargains, Mangrove Retail Park, West Retail Park, Docks Way, Newport (Zone 5)	1.00			1.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.93	0.07	0.00
Texaco Extra, Harlech Retail Park, Cardiff Road, Newport (Zone 5)*	23.14	3,080	13,186	40.61	-17.47	4.45	0.14	4.48	8.05	3.44	0.99	1.70	20.12	3.02	0.00
Asda, Cardiff Road, Newport (Zone 5)****	1.80	1,060	5,869	6.16	3.44	1.80	0.51	1.30	0.88	3.17	1.19	0.00	8.93	0.87	0.00
The Food Warehouse (Indirect), East Retail Park, Newport (Zone 6)*	1.43	680	5,869	5.98	-2.55	0.14	0.00	0.39	0.39	0.00	0.00	0.00	1.22	0.21	0.00
Morrisons, Asda Road, Rogestown (Zone 7)*	14.41	2,898	8,060	26.03	-11.61	0.51	0.00	0.30	0.20	0.79	0.25	0.00	16.11	4.30	0.00
Morrisons Daily, Roman Way, Newport (Zone 2)***	0.63	143	8,060	1.28	-0.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.63	0.00	0.00
Co-op, Cornhill Road, Rogestown, Newport (Zone 4)***	2.41	262	10,017	2.82	-0.41	0.48	0.00	0.00	0.50	0.00	0.00	0.00	2.41	0.00	0.00
Co-op, Tregeynon Road, Rogestown, Newport (Zone 7)*	0.56	252	10,017	2.52	-1.57	0.00	0.00	0.00	0.17	0.00	0.00	0.00	0.96	0.00	0.00
Texaco Express, Cefn Road, Rogestown (Zone 7)	2.54	186	13,186	2.46	0.09	0.00	0.00	0.17	0.00	0.00	0.00	0.34	2.54	0.00	0.00
Other	8.61			8.61	0.00	0.38	0.50	3.90	0.68	0.00	2.04	0.00	8.61	0.00	0.00
Zone 1	0.17			0.17	0.00	0.13	0.00	0.00	0.02	0.00	0.17	0.00	0.17	0.00	0.00
Zone 2	0.26			0.26	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00
Zone 3	3.40			3.40	0.00	0.00	0.24	3.00	0.17	0.00	0.00	0.00	3.40	0.00	0.00
Zone 4	0.98			0.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.98	0.00	0.00
Zone 5	1.48			1.48	0.00	0.19	0.00	0.82	0.00	0.47	0.00	0.00	1.48	0.00	0.00
Zone 7	3.23			3.23	0.00	0.00	0.00	0.00	0.19	0.00	2.04	0.00	3.23	0.00	0.00
TOTAL WITHIN STUDY AREA	326.97		-	322.48	4.34	63.22	16.61	75.68	46.25	48.32	7.18	23.68	278.22	91.99	0.00
TOTAL OUTSIDE STUDY AREA	-		-	-	-	-	-	-	-	-	-	-	-	-	-
Total	-		-	-	-	-	-	-	-	-	-	-	-	-	-

Notes:

1. Survey derived turnover and turnover by zone / elsewhere taken from Table 2

2. Existing convenience footprint derived from the following sources:

*** Based on Covid site visit

*** Footspace derived from VOA (ground floor only) and assumes that 80% comprises the net sales area of which 80% is dedicated to the sale of convenience goods (in line with the M&S average identified by GlobalData (2023))

**** Footspace derived from VOA (ground floor only) and assumes that 80% comprises the net sales area of which 80% is dedicated to the sale of convenience goods

**** Derived from evidence submitted in support of recent application for replacement store at Albany Street (LPA ref. 220438)

**** Derived from evidence submitted in support of planning application reference 180462

**** Footspace derived from Newport Retail and Leisure Study Addendum (2023), but allows for part of the sales area to be used for the sale of convenience goods - in line with the latest estimates for the nearest retailer as identified by GlobalData (2023)

**** Not Footspace derived from Newport Retail and Leisure Study Addendum (2023), but allows for part of the sales area to be used for the sale of convenience goods - in line with the latest estimates for the nearest retailer as identified by GlobalData (2023)

**** Derived from planning permission for the store LPA ref. 201038

**** Derived from supporting evidence submitted in support of Barclays's permission (LPA ref. 201032)

**** Derived from supporting evidence submitted in support of Morrisons's permission (LPA ref. 180103)

**** Derived from planning application reference 180197

1 Derived from evidence submitted in support of planning application reference 180422 and assumes that 80% of the net footprint is occupied by convenience goods

2 Based on a net sales area of 283 square metres to be in line with the Survey Trading Act and assumes that 80% of the footprint is for the sale of convenience goods

Where not highlighted, footspace derived from Newport Retail and Leisure Study (2023)

3. Expected sales densities derived from GlobalData (2024) where available or Covid assumptions

4. Expected turnover = net convenience footprint x sales densities

5. Over / underturning = survey derived turnover minus expected turnover

6. As 2021 prices

Table 4: Retail Capacity (Convenience Goods) - Zones 1, 3, 5 & 6

	2025	2028	2031
Available Expenditure (Zone 1, 3, 5 & 6) (£m)	216.91	219.22	222.15
Expenditure attracted from Zones 1, 3, 5 & 6 (£m)	154.19	155.83	157.91
Current Market Share	71.1%	71.1%	71.1%
Benchmark Turnover of Stores derived from Zones 1, 3, 5 & 6 (£m)	142.48	143.33	144.05
Residual Capacity (£m)	11.71	12.50	13.86
Available Expenditure (Zone 1, 3, 5 & 6) (£m)		219.22	222.15
Expenditure attracted from Zones 1, 3, 5 & 6 (£m)		175.38	177.72
Increased Market Share		80.0%	80.0%
Benchmark Turnover of Stores derived from Zones 1, 3, 5 & 6 (£m)		143.33	144.05
Residual Capacity (£m)	-	32.04	33.67

Notes:

1. Available expenditure derived from Table 1c
2. Expenditure attracted from Zones taken from Table 3
3. Current market share derived from Newport Household Survey (November 2022)
4. Benchmark turnover derived from Table 3
5. Increase in market share based on Quod estimate
6. At 2021 prices

Notes:

1. Available expenditure derived from Table 1c
2. Market shares derived from Newport Household Survey (November 2022)
3. Turnover derived from Zones 6-14 derived from the Newport Retail and Leisure Study Addendum (2023) and turnover derived from elsewhere based on Quod estimates
4. At 2021 prices

Sub-total		Inflow (£m)			Total (£m)
(%)	(£m)	Zone 8,14	Elsewhere	Total	
-	379.74				
19.84%	74.16	2.71	7.42	11.12	85.28
0.89%	2.21	0.06	0.06	0.11	2.32
0.93%	1.12	0.00	0.00	0.00	6.12
0.06%	0.24	0.00	0.00	0.00	0.24
0.07%	0.28	0.00	0.00	0.00	0.28
0.92%	0.90	0.00	0.00	0.00	0.90
0.02%	0.06	0.00	0.00	0.00	0.06
0.34%	1.27	0.00	0.00	0.00	1.27
0.98%	1.18	0.00	0.00	0.00	1.18
2.73%	16.44	1.72	1.04	2.77	13.20
3.86%	1.87	0.00	0.00	0.00	1.87
24.32%	90.99	1.78	1.19	2.88	19.61
0.40%	1.51	0.00	0.00	0.00	1.51
0.26%	0.96	0.00	0.00	0.00	0.96
0.01%	0.04	0.00	0.00	0.00	0.04
0.06%	0.23	0.00	0.00	0.00	0.23
0.74%	2.76	0.60	0.60	0.60	2.76
0.30%	1.12	0.00	0.00	0.00	1.12
0.01%	0.03	0.00	0.00	0.00	0.03
0.11%	0.41	0.00	0.00	0.00	0.41
0.44%	1.87	0.60	0.60	0.60	1.87
1.92%	7.16	1.79	0.36	2.15	9.31
0.40%	1.57	0.71	0.02	0.72	2.30
0.02%	0.07	0.00	0.00	0.00	0.07
3.24%	24.60	6.00	0.86	6.91	47.46
0.00%	0.00	0.00	0.00	0.00	0.00
3.51%	13.13	0.00	0.00	0.00	13.13
0.33%	1.31	0.00	0.00	0.00	1.31
1.75%	6.69	0.00	0.00	0.00	6.69
17.24%	64.90	8.64	1.94	9.58	74.28
0.63%	26.00	0.40	0.90	0.30	42.30
0.44%	36.28	7.84	1.78	9.70	46.98
2.64%	8.81	0.00	0.00	0.00	7.81
1.48%	6.16	0.00	0.00	0.00	6.16
1.31%	4.80	0.00	0.00	0.00	4.80
0.02%	0.06	0.00	0.00	0.00	0.06
0.02%	0.13	0.01	0.00	0.01	0.14
24.83%	92.06	13.56	2.67	16.62	100.08
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
0.00%	0.31	0.00	0.00	0.00	0.31
0.34%	1.26	0.47	0.06	0.54	1.60
0.14%	0.54	0.00	0.00	0.00	0.54
0.81%	3.11	0.47	0.06	0.54	2.65
87.89%	291.89	24.14	6.97	29.21	294.22
0.22%	34.44	-	-	-	-
0.92%	18.39	-	-	-	-
3.86%	14.44	-	-	-	-
2.53%	6.40	-	-	-	-
0.90%	3.37	-	-	-	-
1.89%	7.60	-	-	-	-
0.73%	2.79	-	-	-	-
0.29%	20.97	-	-	-	-
32.97%	119.36	-	-	-	-
100.00%	379.74	-	-	-	-

Table 6a: Turnover of Proposed Development

Proposal	Gross Floorspace (sq m)	Convenience (up to) (sq m)	Comparison (up to) (sq m)	Sales Density (£ per sqm)		Benchmark Turnover - 2025		Benchmark Turnover - 2028		Benchmark Turnover - 2031	
				Convenience	Comparison	Convenience (£m)	Comparison (£m)	Convenience (£m)	Comparison (£m)	Convenience (£m)	Comparison (£m)
Poundland, 28 East Retail Park	1,302	391	911	3,226	3,226	1.26	2.94	1.27	3.18	1.27	3.43

- Notes:
- 1. Assumes the unrealistic approach for 100% of the net floorspace could be for the sale of convenience goods
 - 2. Sales densities derived from GlobalData (2024)
 - 3. Benchmark turnover = net sales area x sales density
 - 4. Allows for increase in turnover through to 2031 based on the latest estimates on productivity identified by Experian (Retail Planner 21, February 2024)
 - 5. At 2021 prices

Table 6b: Trade Draw of Proposal (2028) - Convenience Goods

	Zone 1	Zone 2	Zone 3	Study Area Zone 4	Zone 5	Zone 6	Zone 7	Sub-total from Study Area	Turnover from Outside Study Area	Total
Available Expenditure (£m)	75.46	21.45	82.74	54.27	45.38	15.65	43.71	338.65	-	-
Proportion of Turnover from Zone	30.0%	0.5%	17.5%	1.0%	40.0%	6.5%	3.0%	98.5%	1.5%	100.0%
Turnover of Proposal from Zone (£m)	0.38	0.01	0.22	0.01	0.51	0.08	0.04	1.25	0.02	1.27
Market Share in Zone	0.50%	0.03%	0.27%	0.02%	1.12%	0.53%	0.09%	0.37%	-	-

- Notes:
- 1. Available Expenditure derived from Table 1c
 - 2. Proportion of turnover derived from zone based on Quod estimates taking into account existing shopping patterns, the strength and proximity of competing provision and the nature of the proposed development
 - 3. Turnover of proposal taken from Table 6a
 - 4. Market share in zone based on turnover of proposal from zone expressed as a proportion of available expenditure
 - 5. At 2021 prices

Table 6c: Trade Draw of Proposal (2031) - Convenience Goods

	Zone 1	Zone 2	Zone 3	Study Area Zone 4	Zone 5	Zone 6	Zone 7	Sub-total from Study Area	Turnover from Outside Study Area	Total
Available Expenditure (£m)	76.27	21.54	83.84	55.12	46.11	15.93	44.20	343.01	-	-
Proportion of Turnover from Zone	26.5%	0.5%	18.5%	1.0%	38.5%	8.5%	4.0%	97.5%	2.5%	100.0%
Turnover of Proposal from Zone (£m)	0.34	0.01	0.24	0.01	0.49	0.11	0.05	1.24	0.03	1.27
Market Share in Zone	0.44%	0.03%	0.28%	0.02%	1.06%	0.68%	0.12%	0.36%	-	-

- Notes:
- 1. Available Expenditure derived from Table 1c
 - 2. Proportion of turnover derived from zone based on Quod estimates taking into account existing shopping patterns, the strength and proximity of competing provision and the nature of the proposed development
 - 3. Turnover of proposal taken from Table 6a
 - 4. Market share in zone based on turnover of proposal from zone expressed as a proportion of available expenditure
 - 5. At 2021 prices

Table 7: Convenience Trading Effects of the Proposed Development

Destination	Turnover Pre-development (£m)			Trade Diversion	2028		Turnover Post Development (£m)		Impact	
	2025	2028	2031		(%)	(£m)	2028	2031	2028	2031
Proposed Development							1.27	1.27	-	-
Newport City Centre										
Iceland, Commercial Street	13.45	13.59	13.75	1.1%	0.01	0.01	13.57	13.74	-0.1%	-0.1%
M&S, Friars Walk Shopping Centre	5.21	5.26	5.33	0.2%	0.00	0.00	5.26	5.33	0.0%	0.0%
Sainsbury's Local, Sovereign Arcade, John Frost Square	1.08	1.09	1.11	0.3%	0.00	0.00	1.09	1.10	-0.3%	-0.3%
Tesco Express, Cambrian Road	0.69	0.70	0.70	0.1%	0.00	0.00	0.69	0.70	-0.2%	-0.2%
Other	0.95	0.96	0.98	1.0%	0.01	0.01	0.95	0.96	-1.3%	-1.3%
Sub-total	21.38	21.60	21.87	2.6%	0.03	0.03	21.57	21.83	-0.2%	-0.2%
Malpas District Centre										
Aldi, Barrack Hill, Shaftsbury Street	18.72	18.90	19.13	6.0%	0.08	0.08	18.82	19.06	-0.4%	-0.4%
Other	0.02	0.02	0.02	0.0%	0.00	0.00	0.02	0.02	0.0%	0.0%
Sub-total	18.73	18.92	19.15	6.0%	0.08	0.08	18.84	19.07	-0.4%	-0.4%
Caerleon District Centre	0.37	0.37	0.38	0.0%	0.00	0.00	0.37	0.38	0.0%	0.0%
Caerleon Road District Centre	3.76	3.80	3.84	0.1%	0.00	0.00	3.80	3.84	0.0%	0.0%
Beechwood District Centre	1.32	1.33	1.35	0.0%	0.00	0.00	1.33	1.35	0.0%	0.0%
Goldcroft Common District Centre	2.33	2.35	2.36	0.0%	0.00	0.00	2.35	2.36	0.0%	0.0%
Corporation Road District Centre	1.56	1.58	1.61	0.0%	0.00	0.00	1.58	1.61	0.0%	0.0%
Maindee District Centre	0.59	0.59	0.60	0.0%	0.00	0.00	0.59	0.60	0.0%	0.0%
Newport Retail Park District Centre										
Iceland, Newport Retail Park, Spytty Road	2.98	3.01	3.05	0.1%	0.00	0.00	3.01	3.05	0.0%	0.0%
M&S, Newport Retail Park, Spytty Road	5.97	6.03	6.10	0.1%	0.00	0.00	6.03	6.10	0.0%	0.0%
Tesco Extra, Spytty Road	33.53	33.89	34.36	6.8%	0.09	0.09	33.81	34.27	-0.3%	-0.3%
Home Bargains, Newport Retail Park	0.03	0.03	0.03	0.0%	0.00	0.00	0.03	0.03	0.0%	0.0%
Poundland, Newport Retail Park, Newport	0.66	0.67	0.68	0.0%	0.00	0.00	0.67	0.68	0.0%	0.0%
Other	0.74	0.74	0.75	0.0%	0.00	0.00	0.74	0.75	-0.1%	-0.1%
Sub-total	43.91	44.38	44.97	7.1%	0.09	0.09	44.29	44.88	-0.2%	-0.2%
Commercial Road District Centre										
Asda, Lower Dock Street, Pilgwenilly, Newport	46.67	47.17	47.80	18.5%	0.23	0.24	46.94	47.57	-0.5%	-0.5%
Other	0.06	0.06	0.06	0.0%	0.00	0.00	0.06	0.06	0.0%	0.0%
Sub-total	46.73	47.23	47.86	18.5%	0.23	0.24	47.00	47.62	-0.5%	-0.5%
Bettws Local Centre	1.60	1.61	1.63	0.3%	0.00	0.00	1.61	1.63	-0.2%	-0.2%
Malpas Road Local Centre	1.97	1.99	2.02	0.3%	0.00	0.00	1.99	2.01	-0.2%	-0.2%
Cardiff Road Local Centre	0.30	0.31	0.31	0.0%	0.00	0.00	0.31	0.31	0.0%	0.0%
Clytha Park Road Local Centre	1.75	1.76	1.78	0.3%	0.00	0.00	1.76	1.78	-0.2%	-0.2%
Roman Way, Caerleon Local Centre	0.17	0.17	0.17	0.0%	0.00	0.00	0.17	0.17	0.0%	0.0%
Bingland Local Centre	0.59	0.60	0.60	0.0%	0.00	0.00	0.60	0.60	0.0%	0.0%
Clarence Place Local Centre	2.15	2.18	2.20	0.0%	0.00	0.00	2.18	2.20	0.0%	0.0%
Laurel Drive, Bassaleg Local Centre	0.06	0.06	0.06	0.0%	0.00	0.00	0.06	0.06	0.0%	0.0%
Edge-of / Out-of-centre										
Lidl, Usk Way	5.46	5.52	5.58	1.4%	0.02	0.02	5.50	5.57	-0.3%	-0.3%
Sainsbury's, Albany Street, Newport	40.79	41.18	41.66	11.3%	0.14	0.14	41.04	41.52	-0.3%	-0.3%
Morrisons, Orb Drive, Newport	12.54	12.67	12.85	3.1%	0.04	0.04	12.63	12.81	-0.3%	-0.3%
Asda, Pencarn Way, Coedkernow, Duffryn, Newport	25.56	25.89	26.27	12.4%	0.16	0.16	25.74	26.12	-0.6%	-0.6%
Home Bargains, Maesglas Retail Park, West Retail Park, Docks Way, Newport	1.00	1.01	1.02	0.5%	0.01	0.01	1.00	1.01	-0.7%	-0.7%
Tesco Extra, Harlech Retail Park, Cardiff Road, Newport	23.14	23.42	23.74	13.7%	0.17	0.17	23.24	23.57	-0.7%	-0.7%
Lidl, Cardiff Road, Newport	9.60	9.71	9.85	3.2%	0.04	0.04	9.67	9.81	-0.4%	-0.4%
Aldi, Spytty Road	28.48	28.79	29.18	2.6%	0.03	0.03	28.76	29.14	-0.1%	-0.1%
The Food Warehouse (Iceland), East Retail Park, Newport	1.43	1.45	1.47	0.0%	0.00	0.00	1.45	1.47	0.0%	0.0%
Morrisons, Azalea Road, Rogerstone	14.41	14.60	14.78	2.4%	0.03	0.03	14.57	14.75	-0.2%	-0.2%
Other	15.29	15.47	15.66	0.2%	0.00	0.00	15.47	15.66	0.0%	0.0%
TOTAL WITHIN STUDY AREA	326.97	330.53	334.82	86.0%	1.09	1.10	330.71	335.00	0.1%	0.1%
TOTAL OUTSIDE STUDY AREA	-	-	-	14.0%	0.18	0.18	-	-	-	-
Total	-	-	-	100.0%	1.27	1.27	-	-	-	-

Notes:

1. Turnover pre development taken from Table 3
2. Trade diversion taken from Table 7
3. Turnover of proposal taken from Table 4a
4. Turnover post development = turnover pre development *minus* trade diversion to proposal
5. Impact = reduction in turnover post development expressed as a proportion of reduction in turnover with no development
6. Change in turnover = change between turnover post development in 2031 *minus* turnover pre-development in 2023
7. At 2021 prices

Table 8: Comparison Trading Effects of the Proposed Development

Destination	Turnover Pre-development (£m)			2025	2028	2031	2025	2028	2031	Turnover Post Development (£m)		Impact	
	2025	2028	2031							(%)	2028 (£m)	2031 (£m)	2028
Proposed Development										3.18	3.43		
Newport City Centre	85.28	93.59	101.89	22.5%	0.71	0.77	92.87	101.12	-0.8%	-0.8%			
Malpas District Centre	2.46	2.70	2.93	0.3%	0.01	0.01	2.69	2.93	-0.3%	-0.3%			
Caerleon District Centre	1.51	1.65	1.78	0.0%	0.00	0.00	1.65	1.78	0.0%	0.0%			
Caerleon Road District Centre	0.98	1.07	1.16	0.0%	0.00	0.00	1.07	1.16	0.0%	0.0%			
Handpost District Centre	0.26	0.29	0.31	0.0%	0.00	0.00	0.29	0.31	0.0%	0.0%			
Corporation Road District Centre	0.07	0.08	0.09	0.0%	0.00	0.00	0.08	0.09	0.0%	0.0%			
Maindee District Centre	1.13	1.24	1.35	0.0%	0.00	0.00	1.24	1.35	0.0%	0.0%			
Newport Retail Park District Centre	50.77	55.71	60.68	15.0%	0.48	0.51	55.24	60.17	-0.9%	-0.8%			
Commercial Road District Centre	6.42	7.04	7.67	4.3%	0.13	0.15	6.91	7.53	-1.9%	-1.9%			
Chepstow Road Local Centre	0.04	0.04	0.04	0.0%	0.00	0.00	0.04	0.04	0.0%	0.0%			
Malpas Road Local Centre	1.27	1.40	1.52	0.0%	0.00	0.00	1.40	1.52	0.0%	0.0%			
Cardiff Road Local Centre	0.12	0.13	0.14	0.0%	0.00	0.00	0.13	0.14	0.0%	0.0%			
Bettws Local Centre	0.18	0.19	0.21	0.0%	0.00	0.00	0.19	0.21	0.0%	0.0%			
Highcross Local Centre	0.31	0.34	0.37	0.0%	0.00	0.00	0.34	0.37	0.0%	0.0%			
Ringland Local Centre	0.03	0.03	0.03	0.0%	0.00	0.00	0.03	0.03	0.0%	0.0%			
Underwood Local Centre	0.01	0.01	0.01	0.0%	0.00	0.00	0.01	0.01	0.0%	0.0%			
Edge-of / Out-of-centre													
Sainsbury's, Albany Street, Newport	13.20	14.47	15.73	5.0%	0.16	0.17	14.31	15.56	-1.1%	-1.1%			
Morrisons, Orb Drive, Newport	1.31	1.44	1.57	1.0%	0.03	0.03	1.41	1.53	-2.2%	-2.2%			
Asda, Pencarn Way, Coedkernow, Duffryn, Newport	4.90	5.39	5.88	4.0%	0.13	0.14	5.27	5.74	-2.4%	-2.3%			
Mendalgief Retail Park (aka 'Maesglas Retail Park'), Docks Way, Newport	44.98	49.39	53.79	3.0%	0.10	0.10	49.29	53.68	-0.2%	-0.2%			
Harlech Retail Park, Cardiff Road, Newport	42.30	46.45	50.59	10.0%	0.32	0.34	46.13	50.25	-0.7%	-0.7%			
Lidl, Cardiff Road, Newport	0.06	0.07	0.08	0.0%	0.00	0.00	0.07	0.08	0.0%	0.0%			
Aldi, Spytty Road	2.30	2.52	2.74	1.0%	0.03	0.03	2.49	2.71	-1.3%	-1.3%			
East Retail Park, Newport	9.51	10.43	11.35	22.5%	0.71	0.77	9.71	10.57	-6.9%	-6.8%			
Morrisons, Azalea Road, Rogerstone	1.80	1.98	2.16	0.5%	0.02	0.02	1.97	2.14	-0.8%	-0.8%			
Other	23.01	25.25	27.49	0.5%	0.02	0.02	25.23	27.48	-0.1%	-0.1%			
TOTAL WITHIN STUDY AREA	294.22	322.90	351.99	89.5%	2.84	3.07	320.75	349.24	-0.7%	-0.7%			
TOTAL OUTSIDE STUDY AREA	-	-	-	10.0%	0.32	0.34	-	-					
Total	-	-	-	99.5%	3.16	3.41	-	-					

Notes:

1. Turnover pre development taken from Table 5

2. Trade diversion based on professional assumptions

3. Turnover of proposal taken from Table 4a

4. Turnover post development = turnover pre development *minus* trade diversion to proposal

5. Impact = reduction in turnover post development expressed as a proportion of reduction in turnover with no development

6. Change in turnover = change between turnover post development in 2031 *minus* turnover pre-development in 2023

7. At 2021 prices

Table 10: Overall Trading Effects of the Proposed Development (Convenience and Comparison Goods) - Defined Centres only

Destination	Turnover Pre-development (£m)			Trade Diversion (£m)			Turnover Post Development (£m)		Impact	
	2025	2028	2031	(%)	2028	2031	2028	2031	2028	2031
Proposed Development							4.44	4.70		
Newport City Centre	106.67	115.19	123.76	17.1%	0.75	0.81	114.44	122.96	-0.6%	-0.7%
Beechwood District Centre	1.32	1.33	1.35	0.0%	0.00	0.00	1.33	1.35	0.0%	0.0%
Goldcroft Common District Centre	2.33	2.35	2.36	0.0%	0.00	0.00	2.35	2.36	0.0%	0.0%
Malpas District Centre	21.20	21.62	22.09	1.8%	0.08	0.09	21.53	22.00	-0.4%	-0.4%
Caerleon District Centre	1.88	2.02	2.15	0.0%	0.00	0.00	2.02	2.15	0.0%	0.0%
Caerleon Road District Centre	4.74	4.87	5.01	0.0%	0.00	0.00	4.87	5.01	0.0%	0.0%
Handpost District Centre	0.26	0.29	0.31	0.0%	0.00	0.00	0.29	0.31	0.0%	0.0%
Corporation Road District Centre	1.64	1.66	1.69	0.0%	0.00	0.00	1.66	1.69	0.0%	0.0%
Maindee District Centre	1.72	1.84	1.95	0.0%	0.00	0.00	1.84	1.95	0.0%	0.0%
Newport Retail Park District Centre	94.68	100.09	105.65	12.9%	0.57	0.60	99.53	105.05	-0.6%	-0.6%
Commercial Road District Centre	53.15	54.27	55.53	8.1%	0.37	0.38	53.91	55.15	-0.7%	-0.7%
Chepstow Road Local Centre	0.04	0.04	0.04	0.0%	0.00	0.00	0.04	0.04	0.0%	0.0%
Malpas Road Local Centre	3.25	3.39	3.53	0.1%	0.00	0.00	3.38	3.53	-0.1%	-0.1%
Cardiff Road Local Centre	0.42	0.44	0.45	0.0%	0.00	0.00	0.44	0.45	0.0%	0.0%
Bettws Local Centre	1.78	1.81	1.84	0.1%	0.00	0.00	1.80	1.84	-0.2%	-0.2%
Highcross Local Centre	0.31	0.34	0.37	0.0%	0.00	0.00	0.34	0.37	0.0%	0.0%
Ringland Local Centre	0.62	0.62	0.63	0.0%	0.00	0.00	0.62	0.63	0.0%	0.0%
Underwood Local Centre	0.01	0.01	0.01	0.0%	0.00	0.00	0.01	0.01	0.0%	0.0%
Clytha Park Road Local Centre	1.75	1.76	1.78	0.1%	0.00	0.00	1.76	1.78	-0.2%	-0.2%
Roman Way, Caerleon Local Centre	0.17	0.17	0.17	0.0%	0.00	0.00	0.17	0.17	0.0%	0.0%
Clarence Place Local Centre	2.15	2.18	2.20	0.0%	0.00	0.00	2.18	2.20	0.0%	0.0%
Laurel Drive, Bassaleg Local Centre	0.06	0.06	0.06	0.0%	0.00	0.00	0.06	0.06	0.0%	0.0%
Other	290.30	305.78	321.52	48.4%	2.15	2.28	303.63	319.24	-0.7%	-0.7%
Total within Study Area	590.41	622.12	654.48	88.6%	3.93	4.16	622.63	655.02	0.1%	0.1%
Outside Study Area	-	-	-	11.1%	0.50	0.52	-	-	-	-
Total	-	-	-	99.6%	4.43	4.69	-	-	-	-

Notes:
1. Taken from Table 8 and Table 9
2. At 2021 prices